Efficiency Study of the City of Norwalk and Norwalk Public Schools

FINAL REPORT

Submitted by:

Evergreen Solutions, LLC
2878 Remington Green Circle
Tallahassee, Florida 32308

March 22, 2022
EXECUTIVE SUMMARY
EXECUTIVE SUMMARY

In October 2021, Evergreen Solutions, LLC (Evergreen) was retained by the City of Norwalk, Connecticut, to conduct an Efficiency Study of both City and School operations. The study was intended to focus on the organizational, operational, and financial efficiency and effectiveness of the operations of the City of Norwalk and the Norwalk Public Schools. This executive summary provides an overview of the scope, methodology, structure of the report, major findings, commendations, and recommendations, areas for collaboration, and fiscal impacts.

I. SCOPE OF THE STUDY

The purpose of the study was to ensure that all programs, operations and the structure of the City and Norwalk Public Schools (NPS) are operating at maximum efficiency creating the most good for all of its citizens. The goal was to define and develop an innovative, customized plan to reinvent the City and NPS operations and drive transformational service delivery and cost efficiencies.

As part of the in-depth review, the following broad areas, systems and operations were examined:

**City of Norwalk**
- Administration and Management
  - Corporate Counsel
  - Mayor and Central Organization
  - City and Town Clerk
- Financial Management
- Human Resources
- Community Services
- Public Safety
- Economic and Community Development
- Operations and Public Works
- Information Technology

**Norwalk Public Schools**
- Administration and Management
- Finance Management
  - Grants
  - Purchasing and Accounts Payable
- Human Resources
- School Operations
  - Facilities and Maintenance
  - School Health Services
  - Transportation
- Information Technology
- Educational Operating Efficiency

The study did not simply aim to identify immediate cost savings and improve short-term operations, but focused on identifying appropriate means by which to increase operational efficiency and effectiveness in the short and long-term. As discussed throughout the combined final report, the majority of identified savings are redirected to enhance the overall effectiveness and efficiency of City and NPS operations. In those instances where operational flows crossed over departmental lines, Evergreen explored opportunities for consolidation and relocation of services and operations.

While it is important to focus on the final recommendations for improvement, Evergreen was also able to capture and present a comprehensive picture of the City and NPS operations that
may prove educational and informative for those who are not intimately involved in the internal operations and workflows of all aspects of the City or NPS.

II. METHODOLOGY

Evergreen reviewed both the City and School operations, with the review beginning with the establishment of a work plan in October 2021. Data were collected and analyzed from each department and group, remote and in person interviews, observations and document reviews occurred from November 2021 through February 2022. Draft reports were compiled and edited for the City and NPS, and internal workpapers were gathered to support each chapter of the combined draft report.

On February 16, 2022, City and School leaders and designated staff were provided an initial draft of their portion of the report to review for accuracy and completeness. On February 23, 2022, Evergreen met in person with NPS leaders and staff to review the NPS section of the report, and on February 24, 2022, a similar meeting was held on-site with City leaders and staff. During a one-day, on-site session with each independent group and a series of follow-up meetings and calls, the findings were reviewed for accuracy and completeness. Changes to the draft were made when the accuracy of the data were in question or circumstance had changed since the time of the initial on-site work. Documentation to support those changes were obtained and verified prior to incorporating the recommended changes into the final report.

This combined final report contains two segments, one addressing the City and another addressing NPS. In instances where cross-over issues are identified, the issue is generally addressed in both segments of the report from the perspective of each entity and their role and responsibility in addressing the issue.

III. OVERVIEW OF THE REPORT

The final report is organized in chapters according to the broad functional areas shown in the Scope of Work. Findings, commendations and recommendations for the City and NPS are presented in two separate sections of the report as follows:

<table>
<thead>
<tr>
<th>City of Norwalk</th>
<th>Norwalk Public Schools</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chapter 1</td>
<td>Chapter 1</td>
</tr>
<tr>
<td>Chapter 2</td>
<td>Chapter 2</td>
</tr>
<tr>
<td>Chapter 3</td>
<td>Chapter 3</td>
</tr>
<tr>
<td>Chapter 4</td>
<td>Chapter 4</td>
</tr>
<tr>
<td>Chapter 5</td>
<td>Chapter 5</td>
</tr>
<tr>
<td>Chapter 6</td>
<td>Chapter 6</td>
</tr>
<tr>
<td>Chapter 7</td>
<td>Chapter 7</td>
</tr>
<tr>
<td>Chapter 8</td>
<td>Chapter 8</td>
</tr>
<tr>
<td>Chapter 9</td>
<td>Chapter 9</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Introduction</th>
<th>Administration and Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>Administration</td>
<td>Finance Management</td>
</tr>
<tr>
<td>Financial</td>
<td>School Operations</td>
</tr>
<tr>
<td>Management</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Human Resources</td>
<td>Information Technology</td>
</tr>
<tr>
<td>Community</td>
<td>Educational Operating</td>
</tr>
<tr>
<td>Services</td>
<td>Efficiencies</td>
</tr>
<tr>
<td>Public Safety</td>
<td></td>
</tr>
<tr>
<td>Economic</td>
<td></td>
</tr>
<tr>
<td>Community</td>
<td></td>
</tr>
<tr>
<td>Development</td>
<td></td>
</tr>
</tbody>
</table>
IV. MAJOR FINDINGS, COMMENDATIONS AND RECOMMENDATIONS

This section summarizes the cross-cutting issues as well as key findings and the associated recommendations or commendations by function.

IV.1 Cross-Cutting Issues

Communication

Connecticut school funding statutes place a heavy burden on City governments, which in turn causes inherent tension between the City and their school systems. In Norwalk, the discord between the City and NPS regarding the budget is unproductive and infighting has resulted in a serious breakdown in communication and collaboration between and among the respective functional entities. Evergreen recommends that joint meetings be held which are designed to open the lines of communication, encourage higher levels of information sharing and seek ways for the City and NPS to bridge the communication and funding gaps.

Information Technology

One of the greatest challenges to improving the City’s efficiency is the current state of its technology resources. The lack of resources, staffing and citywide planning for technology is negatively impacting every department, program and function in the City. Evergreen recommends that the City hire a Chief Information Officer (CIO) to oversee all technology planning and operations for the City, fill existing vacancies and staff the department to meet the City needs and conduct a comprehensive needs assessment before implementing a Citywide Technology Master Plan and upgrading or implementing new systems.

Facility Repairs, Replacements, and Renovations

Based on a March 2021 Facility Assessment, a long-term investment over the next 20 years of $429-495 million is needed for various repairs, replacements and renovations. In Connecticut, school facilities are owned by the City but the State provides some funding for facility construction and renovation. The City nor NPS have begun to address the issue. Evergreen recommends that both entities assess NPS campuses to jointly prioritize needs and research funding options.

IV.2 City of Norwalk

Administration and Management

Evergreen commends the City for:

- creating the Common Council Handbook;
- restructuring the administration and reporting structure under a designated Chief;
- containing the cost of liability claims against the City through a collaborative effort between the Legal Department and the City’s third-party insurance provider;
• installing a drop box outside the City Hall and expanding the Town Clerk’s online services; and

• improving the permitting, payment and permit issuing processes for the City Clerk through the use of the eproval online permitting system.

Major recommendations in Administration and Management include:

• establishing a Charter Revision Committee to completely revise the City Charter;

• creating a Communications Office that oversees Customer Service and manages the City website;

• centralizing the processing and tracking for Freedom of Information Act requests;

• digitizing archived records;

• developing a comprehensive Strategic Plan; and

• developing standard operating procedures in each department.

**Financial Management**

Evergreen commends Financial Management for:

• minimizing the potential for payroll calculation errors by using the Novatime system;

• maintaining the City’s AAA Bond credit rating with Standard & Poor’s and Fitch and Aaa with Moody’s;

• achieving close to 100 percent tax collection rates and achieving cost savings by not hiring outside tax attorneys; and

• maintaining strong controls for approving and issuing new P-Cards and controlling the P-Card use within the daily and monthly limits.

Major recommendations in Financial Management include:

• segregating payroll duties to improve internal controls;

• hiring an Internal Auditor to boost the City’s opportunity to identify risks and inefficiencies;

• developing a robust grants management program;

• requiring requisitions to be entered into MUNIS in advance of purchases;

• updating the Purchasing Guidelines in compliance with City Ordinance;
• reviewing and amending budget and purchasing approval processes and thresholds to streamline processes while maintaining a strong system of internal controls; and

• Processing bi-weekly Accounts Payable checks rather than issuing checks daily.

Human Resources

Major recommendations in Human Resources include:

• hiring an additional HR Generalist to provide the level of needed staff support;

• consolidating all of the employee-related policies, procedures and documentation into a single, indexed and searchable Employee Handbook;

• establishing a policy outlining the requirements and conditions for working remotely;

• implementing a talent acquisition system with end-to-end workflow for posting, hiring, and onboarding applicants; and

• developing language in the bargaining agreements that gives management the authority to implement a fair, honest and open performance evaluation system.

Community Services

Evergreen commends Community Services for:

• developing a strong mission statement for Community Services focused on integration of services;

• establishing high standards for Health Department performance as shown through its national accreditation;

• co-locating the Early Childhood Coordinator with the NPS School Readiness Liaison to increase communication between these the two sides of the Early Childhood Program and provide better service to caregivers and families; and

• using the Family Navigator Program to identify and find additional resources for families of school age children.

Major recommendations in Community Services include:

• reorganizing Community Services functions, programs and departments under the three main departments;

• developing written processes and communication channels that facilitate regular communication not only between CSD leadership and school leadership, but also between staff; and
• reorganizing the Library Department functionally to ensure better departmental and location cooperation and cohesiveness.

Public Safety

Major recommendations in Public Safety include:

• implementing a plan to reduce General Fund overtime for both Fire and Police;
• developing and implementing a Public Safety Technology Master Plan;
• developing and implementing a formal Business Intelligence/Analytics initiative to improve the capability for NPD and NFD personnel to leverage system data;
• developing formal training curricula and training aids for all the primary systems (e.g., CAD/RMS);
• establishing a governance structure for the Combined Dispatch Center;
• establishing a comprehensive plan to further streamline the hiring and training process;
• developing an Action Plan to adequately fill School Crossing Guard positions;
• completing comprehensive staffing assessments within Police, Fire, Fire Marshall and the Combined Dispatch Center; and
• developing formal criteria to assess the dependability, reliability, safety and operational value of Fire apparatus.

Economic and Community Development

Evergreen commends Economic and Community Development for:

• reviewing the fee schedules and rates to ensure the City is recovering the cost of providing the services;
• maintaining detailed organization and recordkeeping of Building and Code Enforcement research activities to ensured that patrons promptly receive requested information; and
• expanding the Enterprise Zone initiative to open opportunities in the downtown neighborhoods of South Norwalk and Wall Street-West Avenue.

Major recommendations in Economic and Community Development include:

• developing, and agreeing to implement consistent policies and standards through a working group of representatives from Transportation, Mobility and Parking, Engineering and Public Works;
• continuing with plans to inventory, plan for the conversion of the paper documents to a digital format;

• shifting administrative duties to the Administrative Team to allow the certified inspectors to focus on conducting inspections;

• revising the permit application process to improve the customer experience with Building and Code Enforcement;

• preparing a comprehensive, prioritized list of the $17 million grant backlog and current ongoing projects in Transportation, Mobility and Parking, and assigning staff or contract project managers to each grant and project with a goal of clearing the backlog with the next two years;

• adopting design standards for City streets-public right of way, which accommodates all road users;

• competitively bidding current Parking contract prior to renewal and looking for ways to control City costs and maximize revenues.

Operations and Public Works

Evergreen commends the City for:

• providing comprehensive Engineering services to the City and serving as an engineering resource to most departments;

• utilizing tactical planning and innovations in managing WPCA operations and predicting future resource needs;

• using tactical planning and sound operational practices in the Recreation and Parks Department to enhance its offerings;

• providing Recreation program services in a cost-effective manner; and

• conducting parks and facility maintenance in a highly efficient manner when compared to the amount of demand, and resources available to them to meet the demand.

Major recommendations in Operations and Public Works include:

• renaming OPW to Operations and Chief of OPW to Chief Operating Officer;

• clarifying roles and responsibilities of each service area to ensure accountability and facilitate prioritization;

• developing a comprehensive tree management plan involving all major stakeholders for managing the City’s tree initiative;
monitoring permit workload in 2022 to determine if an additional part-time Permit Inspector is required;

• developing a succession plan for the Building and Facilities Coordinator position to ensure continuity of services.

**Information Technology**

Evergreen commends the Information Technology for:

• the commitment of IT staff to customer service despite staffing and resource shortages; and

• leveraging IT interns to bring in additional support and new skills.

Major recommendations in Information Technology include:

• creating a CIO position that reports to the Mayor and oversees all technology planning and operations for the City;

• filling the Sr Applications Manager and Chief Information Security Officer positions;

• conducting an internal and external needs assessment to determine specific information technology shortcomings; and

• developing and implementing an organizational IT Plan.

**IV.3 Norwalk Public Schools**

**Administration and Management**

Evergreen commends NPS for:

• offering School Board members opportunities for professional growth and development;

• encouraging the Superintendent’s participation in professional associations which provides NPS access to on-line resources, networking, and professional development opportunities;

• establishing an organization structure with an appropriate span of control for the Executive Directors based on current need; and

• implementing a comprehensive Strategic Plan.

Major recommendations in Administration and Management include:

• eliminating the positions of Chief of Staff and Communication, Communications Manager, and Executive Assistant and reorganizing the communications function under the Deputy Superintendent;
• assigning responsibility to the Labor Relations Legal Counsel to ensure adequate monitoring and accounting of Freedom of Information Act requests;
• managing contracts to reduce costs of legal services to 2018-19 levels;
• developing a comprehensive Administrative Regulations Manual; and
• continuing to review and document policy revisions.

Financial Management

Evergreen commends Financial Management for:
• taking the initial steps to maximize the use of grant funds by tracking the expenses they cover and utilizing budgets to guide them;
• maximizing the use of Position Control as a budgetary tool and a guide for adding new positions or changes to positions;
• providing purchasing training and user support documents to NPS employees that provide detailed instructions for processing purchases through to the point when invoices are paid;
• requiring requisitions and purchase orders encumbering funds at the time that a decision to purchase is made deters the overspending of budgets; and.
• establishing controls over the P-Card issuance that include daily monitoring of purchases to detect fraudulent or inappropriate purchases.

Major recommendations in Financial Management include:
• developing a plan to fully implement the MUNIS assessment and recommendations;
• utilizing the Newman + DLR Group facility assessment of NPS campuses to prioritize what actions to take to continue the renovation plans;
• tracking all capital assets;
• centralizing all activity fund transactions; and
• working with the Comptroller’s staff to implement an electronic process for submitting requests for payment.

Operations

Evergreen commends Operations for:
• for being recognized by the National Renewable Energy Laboratory for converting its buses from diesel to propane and trailblazing the implementation of clean fuel;
Executive Summary

Efficiency Study of the City of Norwalk and Norwalk Public Schools

- using custodian floaters to continue to keep the campuses clean when there is absent staff;
- renegotiating the contract for regular education transportation which includes accountability standards for the vendor to ensure performance and offers students and parents higher levels of service;
- implementing a tracking system to monitor student riders and identify students that require an adult to be present for pick up;
- providing Registered Nurses at each campus to meet the needs of all its students; and
- developing procedures and protocols to address health and safety needs related to the COVID pandemic and collaborated with the City Health Department and 3rd party providers to meet the medical needs of NPS students.

Major recommendations in Operations include:

- eliminating the $400,000 limit in City ordinance §30-15.1 for capital construction projects and require the City and NPS coordinate to identify the best division of work based on available resources;
- incorporating the facilities maintenance recommendations from facilities and other studies into the maintenance work schedule;
- contracting for facilities maintenance services for all NPS buildings;
- documenting the 25-foot maintenance requirement with the City and open lines of communication regarding special needs and areas where better coordination will benefit both groups;
- developing a consistent facility rental form and process for both the City and NPS;
- exploring the feasibility of installing stop-arm cameras on school buses to increase student safety and potentially generate revenues for the District.

Human Resources

Evergreen commends Human Resources for:

- developing a comprehensive Employee Handbook that contains policies and procedures to guide all employees;
- tracking turnover trends, particularly those for teachers, in an effort to plan for and stay ahead of the staffing needs of the schools;
- using social media, radio ads, billboards, and a number of other innovative approaches to recruit candidates for open positions and has a process in place to evaluate the effectiveness of these efforts;
Executive Summary Efficiency Study of the City of Norwalk and Norwalk Public Schools

- effectively using the results of the annual Panorama Surveys to identify predictive issues affecting staff turnover; and

- using a decentralized process for posting and filling vacancies which gives principals and department heads more control over the posting and selection processes.

Major recommendations in Human Resources include:

- hiring an additional HR Generalist position to reduce the current workload.

- working with the School Board liaison to identify personnel policies needing revision, and refer the recommended changes to the School Board for review and approval.

- compiling a benefit guide that not only shows the many benefits provided by NPS, but also provides contact information and links to where additional information can be found.

Information Technology

Evergreen commends NPS for:

- providing each student in Norwalk Public Schools at least one device for learning and instruction;

- offering the Parent University which provides valuable services to parents in Norwalk Public Schools; and

- purposefully planning for technology integration into instruction, recognizing the role it can and should play in student learning, and using forward thinking in making technology use user-friendly.

Major recommendations in Information Technology include:

- developing a collaborative approach for providing technical support to NPS and City users;

- hiring three additional full-time Instructional Coaches to support educational technology and one additional full-time IT Technician; and

- developing and implementing a three-year Education Technology Plan.

Educational Operating Efficiency

Evergreen commends NPS for:

- establishing a campus-based budget allocation process that is documented and well-organized, and requires Principals to align the staffing and budget allocations to the District’s overall goals and objectives; and
• providing consistent campus-level staffing of administrators and professional support based on enrollment and need.

Major recommendations in Educational Operating Efficiency include:

• consistently reporting total staffing numbers, including staff paid from all sources;

• establishing a process whereby Principals have additional input into the budget creation process, including the identification of capital budget needs within their schools;

• developing a staffing plan to establish educationally sound, but more efficient teacher and paraprofessional staffing guidelines, particularly at the elementary level;

• organizing and simplifying the extra duty pay categories and searching for ways to immediately begin reducing total costs; and

• establishing a joint City/NPS working group to carefully review how the ESSER funds were used and identify the areas where these funds were used to supplant ongoing operations.

V. CURRENT AND PROPOSED OPPORTUNITIES FOR COLLABORATION

During the study process, Evergreen attempted to identify areas within the City and NPS operations where collaboration and shared services already existed as well as opportunities to consolidate services and leverage volume-driven cost savings.

Throughout the report, there are commendations relating to those program areas where collaboration between the City and NPS are improving efficiency or improving the services delivered to the community. Notable examples include:

• NPS and the City Health Department collaborated during the Pandemic, not only to deliver testing and vaccinations, but also in the processes for contact tracing of students and staff cases.

• The City Comptroller and NPS Finance office collaboratively provide oversight and control of P-Card (Purchasing cards) issuance and use.

• Co-locating the Early Childhood Coordinator with the NPS School Readiness Liaison increases communication between these the two sides of the Early Childhood Program and provides better service to caregivers and families.

• School Transportation collaborates regularly with the City to identify congestion, road repairs or other transportation matters that could impede the timely movement of students to and from school.
In terms of the potential for consolidating services, Evergreen focused on the following major functional areas:

**Information Technology**

As noted above, Evergreen identified Information Technology as the greatest challenge to efficiency citywide. NPS has a more developed, education-specific information technology program but is in no position to absorb the City’s IT operation, nor is the City in a position to provide the level or type of IT support needed by the schools. The City currently has a proliferation of independent programs in all of the departments, many of which are not integrated with the MUNIS system, which is the Enterprise Resource Planning (ERP) system for both the City and the Schools. MUNIS is used for financial accounting and budgeting, purchasing, payroll, human resource management, however, a system upgrade is planned to replace the outdated version, not all modules are being used efficiently, and there are conflicting needs between NPS and the City based on program needs. Since the Evergreen study began, a joint NPS/City working group has been formed to address the MUNIS upgrades and the modules and components needed to satisfy the needs of both entities. Evergreen recommends that an IT resource sharing and collaboration plan be developed between the City and Schools.

**Human Resources**

Evergreen found no compelling evidence to support a consolidation of the four human resource functions currently operating within Norwalk City government, including City (general), NPS, Police and Fire. The City and NPS operate full-service human resource offices with very unique staffing needs, state and federal reporting requirements and a variety of bargaining units. In addition, both the Norwalk Fire Department and Norwalk Police Department operate a blended human resource function with these departments overseeing recruitment, job posting, applicant screening and testing and hiring. The City Personnel Department handles master record keeping, pension and benefits for Fire and Police employees, and union contract negotiations for these departments are handled by the City. At this time, staffing levels and expertise and the talent acquisition system used by the City could not support the Police and Fire needs; however, Evergreen recommended that the City procure a more robust talent acquisition system, which, when fully implemented, may be capable of providing additional support to the Police and Fire Departments.

**Financial Management**

The Financial Management functions that can be consolidated—such as payroll processing and accounts payable activities—have already been consolidated under the City Comptroller. Evergreen found no additional functions that could be consolidated to improve efficiency; however, a recommendation is made to identify the joint procurement needs of NPS and the City, and to the extent possible, combine solicitations to maximize the buying power of both entities.

The MUNIS system is at the heart of most City and NPS financial functions. Because MUNIS is a shared system, upgrades and the addition or modification of modules to that system will require the City and NPS to reach mutually beneficial solutions. Evergreen has identified many areas
where MUNIS functionality can and should be maximized to streamline processes, reduce manual and redundant entry, and strengthen controls for one or both entities.

**Facility Management and Operations**

Evergreen found the Facility Management functions within the City and NPS to contain considerable overlap and redundancies that appear to result from lack of clear documentation relating to the roles and responsibilities of the departments as well as funding flows and sources of funding. Arbitrary lines of demarcation with the City maintaining all City facilities and grounds up to 25 feet of the school buildings, per se, and NPS being responsible for the final 25 feet around the buildings has led to conflicts regarding the maintenance of fences, trees and downed limb removal, snow removal, upkeep of flower beds and gardens, upkeep of playgrounds, and a host of other issues. This issue is not only evident between NPS and the City in general, but in and among the various City departments with tangential or direct responsibility for different functions. Currently, the division of responsibility for renovation or construction projects between NPS and the City are made based on the dollar amount of the project. Evergreen attempted to navigate the complex labyrinth of facility construction and maintenance and made recommendations for documenting and clarifying expectations, eliminating or reducing redundancies, and creating mechanisms where meaningful collaboration can occur.

**VI. SUMMARY OF RECOMMENDATIONS AND FISCAL IMPACTS**

The following charts contain a listing of all of the recommendations contained in both reports showing the five-year fiscal impacts for each recommendation and a final net cost or savings proposed for all recommendations within the City of Norwalk segment of the report and the Norwalk Public Schools segment of the report.

**Exhibit 1** provides a five-year summary of proposed costs and savings by segment, and a grand total of costs and savings overall.

**Exhibit 1**

**Five-Year Summary of Estimated (Costs) Savings**

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
<th>Five-Year Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Norwalk</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Savings</td>
<td>$1,592,856</td>
<td>$2,740,356</td>
<td>$3,715,731</td>
<td>$4,544,800</td>
<td>$4,544,800</td>
<td>$17,138,543</td>
</tr>
<tr>
<td>(Costs)</td>
<td>($2,691,199)</td>
<td>($5,291,199)</td>
<td>($5,291,199)</td>
<td>($1,541,199)</td>
<td>($1,541,199)</td>
<td>($16,355,995)</td>
</tr>
<tr>
<td>Net City (Costs)/Savings</td>
<td>($1,098,343)</td>
<td>($2,550,843)</td>
<td>($1,575,468)</td>
<td>$3,003,601</td>
<td>$3,003,601</td>
<td>$782,548</td>
</tr>
<tr>
<td>Norwalk Public Schools</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Savings</td>
<td>$3,519,194</td>
<td>$2,519,194</td>
<td>$2,519,194</td>
<td>$2,519,194</td>
<td>$2,519,194</td>
<td>$13,595,970</td>
</tr>
<tr>
<td>(Costs)</td>
<td>($1,073,251)</td>
<td>($1,059,751)</td>
<td>($1,059,751)</td>
<td>($1,059,751)</td>
<td>($1,059,751)</td>
<td>($5,312,255)</td>
</tr>
<tr>
<td>Net NPS (Costs)/Savings</td>
<td>$2,445,943</td>
<td>$1,459,443</td>
<td>$1,459,443</td>
<td>$1,459,443</td>
<td>$1,459,443</td>
<td>$8,283,715</td>
</tr>
<tr>
<td>Combined Costs)/Savings</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Grand Total Combined (Costs)/Savings</td>
<td>$1,347,600</td>
<td>($1,091,400)</td>
<td>($116,025)</td>
<td>$4,463,044</td>
<td>$4,463,044</td>
<td>$9,066,263</td>
</tr>
</tbody>
</table>
a. **Summary of City of Norwalk Recommendations and Fiscal Impacts**

A complete list of all recommendations made for the City of Norwalk are found in Exhibit 2. Detailed findings can be found in the associated chapters. Recommendations to add or eliminate a full-time staff position include the estimated salary plus benefits of 69.89 percent.

**Exhibit 2**

**Summary of City of Norwalk Recommendations and Estimated Five-Year Fiscal Impacts**

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.0 Administration and Management</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2-1</td>
<td>Clarify the process for Council Members to use when requesting information or services and sharing complaints.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-2</td>
<td>Discontinue the practice of printing and delivering hard copy agenda packets to administrators and Common Council members in advance of each meeting.</td>
<td>$7,200</td>
<td>$7,200</td>
<td>$7,200</td>
<td>$7,200</td>
<td>$7,200</td>
</tr>
<tr>
<td>2-3</td>
<td>Rename the Departments reporting to a Chief as a Division to clarify the chain of command.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-4</td>
<td>Implement a regularly scheduled Leadership Team meeting to improve communication and a sense of inclusion for those in a leadership role with the City.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-5</td>
<td>Create a Communications Office that oversees Customer Service and manages the City website.</td>
<td>($64,178)</td>
<td>($64,178)</td>
<td>($64,178)</td>
<td>($64,178)</td>
<td>($64,178)</td>
</tr>
<tr>
<td>2-6</td>
<td>Develop tighter controls over cash in the Office of the Town Clerk</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-7</td>
<td>Develop operational procedures for the Office of the Town Clerk</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-8</td>
<td>Include the Town Clerk as part of the City Leadership Team to ensure all departments are effectively communicating.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-9</td>
<td>Expand the information available on the City website to stakeholders about the Office of the Town Clerk.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-10</td>
<td>Evaluate the Town Clerk’s Office layout to develop a more secure space, increase the safety of staff, and improve the customer traffic flow.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-11</td>
<td>Centralize the processing and tracking for Freedom of Information Act requests to ensure that the requests are recorded and responded to in compliance with the Act.</td>
<td>($109,779)</td>
<td>($109,779)</td>
<td>($109,779)</td>
<td>($109,779)</td>
<td>($109,779)</td>
</tr>
</tbody>
</table>
### Exhibit 2 (Continued)
#### Summary of City of Norwalk Recommendations and Estimated Five-Year Fiscal Impacts

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>2-12</td>
<td>Develop a consistent plan for charging for the Freedom of Information Act services provided, including staff research time and copying expenses.</td>
<td>$10,000</td>
<td>$10,000</td>
<td>$10,000</td>
<td>$10,000</td>
<td>$10,000</td>
</tr>
<tr>
<td>2-13</td>
<td>Begin the process of digitizing archived records and establish a plan for the project to be completed within the next five years.</td>
<td>($100,000)</td>
<td>($100,000)</td>
<td>($100,000)</td>
<td>($100,000)</td>
<td>($100,000)</td>
</tr>
<tr>
<td>2-14</td>
<td>Reassess the charges for the use of the Concert Hall to ensure that the City is reimbursed for the cost of providing this Hall to the public and ensure that pricing is standardized for all renters.</td>
<td>$15,000</td>
<td>$15,000</td>
<td>$15,000</td>
<td>$15,000</td>
<td>$15,000</td>
</tr>
<tr>
<td>2-15</td>
<td>Develop a comprehensive strategic plan and implement follow through by linking the budget to the plan and continually monitoring progress.</td>
<td>($20,000)</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-16</td>
<td>Establish a Charter Revision Committee to completely revise the City Charter.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-17</td>
<td>Develop standard operating procedures in each department beginning with key functions performed by employees nearing retirement.</td>
<td>($150,000)</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td></td>
<td><strong>Total Administration and Management</strong></td>
<td>($411,757)</td>
<td>($241,757)</td>
<td>($241,757)</td>
<td>($241,757)</td>
<td>($241,757)</td>
</tr>
<tr>
<td>3-1</td>
<td>Segregate payroll duties by having Personnel staff set up employees and Comptroller staff prepare the payroll and process payments.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-2</td>
<td>Once the Separation of Duties Control has been implemented and is working properly, restrict the ability to “add/change/delete” sensitive employee records (such as salary and related data) to the Personnel Department.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-3</td>
<td>Hire an Internal Auditor to boost the City’s opportunity to identify risks, inefficiencies, and proactive responses.</td>
<td>($231,050)</td>
<td>($231,050)</td>
<td>($231,050)</td>
<td>($231,050)</td>
<td>($231,050)</td>
</tr>
<tr>
<td>3-4</td>
<td>Develop a strong internal control system for cash collections</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-5</td>
<td>Develop a robust grants management program.</td>
<td>($91,986)</td>
<td>($91,986)</td>
<td>($91,986)</td>
<td>($91,986)</td>
<td>($91,986)</td>
</tr>
</tbody>
</table>
### Exhibit 2 (Continued)
**Summary of City of Norwalk Recommendations and Estimated Five-Year Fiscal Impacts**

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>3-6</td>
<td>Develop and implement a formal policy documenting the disposal of assets, the inventory of assets, and the tracking of assets.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-7</td>
<td>Develop a plan for the Joint Education Finance Committee to meet quarterly to begin to open the lines of communication.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-8</td>
<td>Review the statutes and ordinances to determine the law regarding the threshold for budget amendments requiring BET approval.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-9</td>
<td>Use position control as a budgetary tool and establish guidelines for adding new positions or making changes to positions.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-10</td>
<td>Alter remote work schedules to bring more guidance to the staff and hands on expertise to the Tax Assessors Department.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-11</td>
<td>Immediately update the Purchasing Guidelines in compliance with City Ordinance, and simultaneously begin developing a user handbook providing the step-by-step instructions to carry out the stated policies.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-12</td>
<td>Amend the Purchasing guidelines to clarify that an approved purchase order is required prior to any purchase; if exceptions are to be made the situation and circumstances for a waiver should be documented in the Guidelines.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-13</td>
<td>Retain the thresholds for competitive procurements, but delegate approval authority to the Mayor for awards and changes up to $100,000, provided no budget amendment is required.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-14</td>
<td>Work with the School’s Purchasing Agent to identify the joint procurement needs of NPS and the City, and to the extent possible, combine solicitations to maximize the buying power of both entities.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-15</td>
<td>Require requisitions to be entered in advance of P-Card purchases over $10,000.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>
### Exhibit 2 (Continued)

#### Summary of City of Norwalk Recommendations and Estimated Five-Year Fiscal Impacts

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>3-16</td>
<td>Establish the requirements for an individual or company to become an authorized vendor for the City or NPS, and activate the MUNIS module for vendors to apply online.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-17</td>
<td>Require all City and NPS receiving departments to scan all supporting and receiving documents into MUNIS and use the system to record the Comptroller’s rejections or approvals for payment.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-18</td>
<td>Process Accounts Payable checks bi-weekly.</td>
<td>$118,923</td>
<td>$118,923</td>
<td>$118,923</td>
<td>$118,923</td>
<td>$118,923</td>
</tr>
<tr>
<td>3-19</td>
<td>Develop a comprehensive Financial Procedures Manual</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td></td>
<td><strong>Total City Financial Management</strong></td>
<td>$(204,113)</td>
<td>$(204,113)</td>
<td>$(204,113)</td>
<td>$(204,113)</td>
<td>$(204,113)</td>
</tr>
<tr>
<td>4.0</td>
<td><strong>Human Resources</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4-1</td>
<td>Hire an additional HR Generalist to provide the level of staff support needed for an organization that serves both active and retired employees.</td>
<td>$(135,912)</td>
<td>$(135,912)</td>
<td>$(135,912)</td>
<td>$(135,912)</td>
<td>$(135,912)</td>
</tr>
<tr>
<td>4-2</td>
<td>Consolidate all of the employee-related policies, procedures and documentation into a single, indexed and searchable Employee Handbook.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-3</td>
<td>Regularly terminate any temporary part-time employees in the payroll system that have not received a paycheck within the last 18 months.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-4</td>
<td>Establish a policy outlining the requirements and conditions for working remotely, and have employees sign an agreement acknowledging the requirements.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-5</td>
<td>Work with the Comptroller and Information Technology to automate the retiree COLA calculation and change process.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-6</td>
<td>Work with the New Budget Director to set up a position control process that automates the position budgeting and monitoring processes.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-7</td>
<td>Research and implement a talent acquisition system with end-to-end workflow for posting, hiring, and onboarding applicants.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>
### Exhibit 2 (Continued)
#### Summary of City of Norwalk Recommendations and Estimated Five-Year Fiscal Impacts

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>4-8</td>
<td>Work with Information Technology and the City Clerk to begin the process of digitizing records for retention purposes.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-9</td>
<td>Update the job description to include information on the current duties and responsibilities of each position.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-10</td>
<td>Implement monthly consultation sessions with each union president to include discussions regarding emerging issues and employee performance matters, when appropriate.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-11</td>
<td>Develop language that gives management the authority to implement a fair, honest and open performance evaluation system that emphasizes the goal of continual improvement, as union contracts are renegotiated.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td></td>
<td><strong>Total Human Resources</strong></td>
<td>($135,912)</td>
<td>($135,912)</td>
<td>($135,912)</td>
<td>($135,912)</td>
<td>($135,912)</td>
</tr>
</tbody>
</table>

#### 5.0 Community Services

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>5-1</td>
<td>Reorganize Community Services functions, programs and departments under the three main departments, and assign staff to oversee programs that are currently the sole responsibility of the Chief.</td>
<td>$62,859</td>
<td>$62,859</td>
<td>$62,859</td>
<td>$62,859</td>
<td>$62,859</td>
</tr>
<tr>
<td>5-2</td>
<td>Update City ordinances to clearly define the CSD Chief role and responsibilities and modify job descriptions for the Chief and the department heads to clearly articulate supervisory responsibilities and relationships.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>5-3</td>
<td>Develop a tactical plan with performance measures that links CSD operations to the City’s strategic plan recommended in Chapter 2.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>5-4</td>
<td>Develop written processes and communication channels that facilitate regular communication not only between CSD leadership and school leadership, but also between staff.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>
### Exhibit 2 (Continued)
*Summary of City of Norwalk Recommendations and Estimated Five-Year Fiscal Impacts*

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>5-5</td>
<td>Continue with plans to utilize a web-based program for Environmental Health, provide training on MUNIS, and move as many of the financial tasks as possible away from FoxPro and into MUNIS.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>5-6</td>
<td>Reorganize the Library Department functionally to ensure better departmental and location cooperation and cohesiveness.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>5-7</td>
<td>Update the Human Services Department organizational structure to create a cohesive and integrated collection of programs.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>5-8</td>
<td>Continue to provide Fair Rent service through a contracted attorney, and update the ordinance associated with the Human Relations Commission to include the current CSD structure and clearly articulate responsibilities between the two.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6.0 Public Safety</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6-1</td>
<td>Implement a plan to reduce General Fund overtime for both Fire and Police by a minimum of 15 percent per year each year for the next four years.</td>
<td>$1,350,000</td>
<td>$2,497,500</td>
<td>$3,472,875</td>
<td>$4,301,944</td>
<td>$4,301,944</td>
</tr>
<tr>
<td>6-2</td>
<td>Develop and implement a Public Safety Technology Master Plan</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-3</td>
<td>Initiate a CAD/RMS Replacement Project, in conjunction with the Technology Master Plan.</td>
<td>($1,000,000)</td>
<td>($20,000)</td>
<td>($20,000)</td>
<td>($20,000)</td>
<td>($20,000)</td>
</tr>
<tr>
<td>6-4</td>
<td>Employ a Quality Assurance/Quality Information (QA/QI) process to achieve the desired standard or quality data, consistency of information and consistency of operations.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-5</td>
<td>Develop and implement a formal Business Intelligence/Analytics initiative to improve the capability for NPD and NFD personnel to leverage system data.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-6</td>
<td>Develop formal training curricula and training aids for all the primary systems (e.g., CAD/RMS).</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>
### Exhibit 2 (Continued)
#### Summary of City of Norwalk Recommendations and Estimated Five-Year Fiscal Impacts

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>6-7</td>
<td>Develop and implement a policy and procedures for Police and Fire Department personnel to report technology issues.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-8</td>
<td>Establish a governance structure for the Combined Dispatch Center</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-9</td>
<td>Incorporate ISO scoring into the Combined Dispatch Center’s primary objectives.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-10</td>
<td>Complete a formal PSAP staffing assessment based on all relevant factors.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-11</td>
<td>Incorporate minimum mandatory performance metrics to accurately evaluate Combined Dispatch Center operations.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-12</td>
<td>Establish a comprehensive plan to further streamline the Police hiring and training process.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-13</td>
<td>Develop comprehensive checklists for all major crimes for Patrol personnel to use as a guide to complete on-scene investigations</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-14</td>
<td>Evaluate the options to assign a sworn or civilian staff as a Crime Analyst.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-15</td>
<td>Develop an Action Plan to adequately fill School Crossing Guard positions</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-16</td>
<td>Complete a staffing assessment to ascertain whether a full-time Digital Evidence Detective is needed.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-17</td>
<td>Implement the RollKall application and related procedures.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-18</td>
<td>Complete a Total Cost of Ownership assessment regarding the management of BWC/In-Car Camera videos.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-19</td>
<td>Comprehensively assess and modify the EMD policies, processes and protocols in collaboration with Fire, EMS and Police personnel.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-20</td>
<td>Develop formal criteria to assess the dependability, reliability, safety and operational value of Fire apparatus.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-21</td>
<td>Conduct a comprehensive staffing and workload assessment of the Fire Marshal's Section, and immediately fill all vacancies.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>

**Total Public Safety**  
$350,000 $2,477,500 $3,452,875 $4,281,944 $4,281,944
### Exhibit 2 (Continued)
**Summary of City of Norwalk Recommendations and Estimated Five-Year Fiscal Impacts**

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.0 Economic and Community Development</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7-1</td>
<td>Develop, and agree to implement, consistent policies and standards through a working group of representatives from Transportation, Mobility and Parking, Engineering and Public Works, after vetting all projects, emerging issues, and grant applications to ensure these departments begin working with common goals and objectives for the City</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-2</td>
<td>Place a moratorium on developing and implementing any new systems until a CIO has been hired and a full citywide needs assessment has been completed.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-3</td>
<td>Continue with plans to inventory and plan for the conversion of the paper documents to a digital format, digitize and index all historical records.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-4</td>
<td>Prepare a comprehensive Procedures Manual for each of the four Departments within Economic and Community Development.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-5</td>
<td>Implement a consistent practice and fee schedule for record searches.</td>
<td>$24,374</td>
<td>$24,374</td>
<td>$24,374</td>
<td>$24,374</td>
<td>$24,374</td>
</tr>
<tr>
<td>7-6</td>
<td>Coordinate with the new recommended Webmaster to ensure consistency in all webpages.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-7</td>
<td>Shift administrative duties to the Administrative Team to allow the certified inspectors to focus on conducting inspections.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-8</td>
<td>Revise the permit application process to improve the customer experience with the Building and Code Enforcement Department.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-9</td>
<td>Develop a ticketing process for the initial blight warnings.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-10</td>
<td>Evaluate the external blight program title searches to determine if the Corporate Council could reconsider the opportunity to have City departments conduct property ownership title searches.</td>
<td>$4,500</td>
<td>$4,500</td>
<td>$4,500</td>
<td>$4,500</td>
<td>$4,500</td>
</tr>
</tbody>
</table>
### Exhibit 2 (Continued)
Summary of City of Norwalk Recommendations 
and Estimated Five-Year Fiscal Impacts

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>7-11</td>
<td>Incorporate the Department’s ongoing initiatives into a planning document with a corresponding Department website to inform the public.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-12</td>
<td>Shift the number of staff positions reporting to both the director and the assistant director to equitably assign the Department’s functions.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-13</td>
<td>Monitor permit application and inspection workload in FY 22 to determine if additional staff are warranted.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-14</td>
<td>Prepare a comprehensive, prioritized list of the grant backlog and current ongoing projects, and assign staff or contract project managers to each grant and project with a goal of clearing the backlog with the next two years.</td>
<td>($156,778)</td>
<td>($156,778)</td>
<td>($156,778)</td>
<td>($156,778)</td>
<td>($156,778)</td>
</tr>
<tr>
<td>7-15</td>
<td>Create and adopt design standards for City streets-public right of way, which accommodates all road users, in collaboration with Engineering, Public Works and stakeholders from various boards and commissions.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-16</td>
<td>Contract for oversight of the Signage and Pavement Markings program.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-17</td>
<td>Competitively bid the Parking contract and look for ways to control City costs and maximize revenues, prior to renewing the current Parking contract.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>8.0 Operations and Public Works</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8-1</td>
<td>Rename OPW to Operations and Chief of OPW to Chief Operating Officer.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>8-2</td>
<td>Clarify roles and responsibilities of each service area to ensure accountability and facilitate prioritization.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>8-3</td>
<td>Leverage Cityworks data to determine and communicate an optimal allocation of resources to match short- and long-term public needs.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>
## Exhibit 2 (Continued)
### Summary of City of Norwalk Recommendations and Estimated Five-Year Fiscal Impacts

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>8-4</td>
<td>Develop a comprehensive tree management plan involving all major stakeholders for managing the City’s tree initiative.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>8-5</td>
<td>Develop a tactical plan for OPW to set goals, prioritize projects, identify resources, and ensure successful implementation and align with the budget request.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>8-6</td>
<td>Monitor permit workload in 2022 to determine if an additional part-time Permit Inspector is required.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>8-7</td>
<td>Change the name of the Operations Division to the Public Works Department.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>8-8</td>
<td>Develop a succession plan for the Building and Facilities Coordinator position to ensure continuity of services.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td></td>
<td><strong>Total Operations and Public Works</strong></td>
<td><strong>$0</strong></td>
<td><strong>$0</strong></td>
<td><strong>$0</strong></td>
<td><strong>$0</strong></td>
<td><strong>$0</strong></td>
</tr>
<tr>
<td>9-1</td>
<td>Create a CIO position that reports to the Mayor and oversees all technology planning and operations for the City.</td>
<td><strong>($239,181)</strong></td>
<td><strong>($239,181)</strong></td>
<td><strong>($239,181)</strong></td>
<td><strong>($239,181)</strong></td>
<td><strong>($239,181)</strong></td>
</tr>
<tr>
<td>9-2</td>
<td>Fill the Sr Applications Manager and Chief Information Security Officer positions.</td>
<td><strong>($242,335)</strong></td>
<td><strong>($242,335)</strong></td>
<td><strong>($242,335)</strong></td>
<td><strong>($242,335)</strong></td>
<td><strong>($242,335)</strong></td>
</tr>
<tr>
<td>9-3</td>
<td>Continue to utilize the internal Geographic Information System (GIS) Analyst position as well as outsource part of the GIS support role to an external vendor.</td>
<td><strong>($150,000)</strong></td>
<td><strong>($150,000)</strong></td>
<td><strong>($150,000)</strong></td>
<td><strong>($150,000)</strong></td>
<td><strong>($150,000)</strong></td>
</tr>
<tr>
<td>9-4</td>
<td>Conduct an internal and external needs assessment to determine specific information technology shortcomings and needs of staff and other stakeholders (residents, visitors, commercial).</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>9-5</td>
<td>Develop and implement an organizational IT Plan.</td>
<td>$0</td>
<td><strong>($3,750,000 )</strong></td>
<td><strong>($3,750,000 )</strong></td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>9-6</td>
<td>Develop an IT resource sharing and collaboration plan between the City and NPS.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>9-7</td>
<td>Create a Technology Policies and Procedures Manual.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Rec. #</td>
<td>Recommendation</td>
<td>2022-23</td>
<td>2023-24</td>
<td>2024-25</td>
<td>2025-26</td>
<td>2026-27</td>
</tr>
<tr>
<td>-------</td>
<td>--------------------------------------------------------------------------------</td>
<td>---------</td>
<td>---------</td>
<td>---------</td>
<td>---------</td>
<td>---------</td>
</tr>
<tr>
<td>9-8</td>
<td>Develop a technology competency and training plan for City employees.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td></td>
<td>Total Information Technology</td>
<td>($631,516)</td>
<td>($4,381,516)</td>
<td>($4,381,516)</td>
<td>($631,516)</td>
<td>($631,516)</td>
</tr>
<tr>
<td></td>
<td>GRAND TOTAL NET SAVINGS (COSTS)</td>
<td>($988,674)</td>
<td>($2,441,174)</td>
<td>($1,465,799)</td>
<td>$3,113,270</td>
<td>$3,113,270</td>
</tr>
</tbody>
</table>
b. **Summary of Norwalk Public Schools Recommendations and Fiscal Impacts**

A complete list of all recommendations made for the Norwalk Public Schools are found in Exhibit 3. Detailed findings can be found in the associated chapters. Recommendations to add or eliminate a full-time staff position include the estimated salary plus benefits of 30.0 percent, which is the estimated average amount of the benefits paid by NPS for all school employees. The pension and related benefits paid by the State for teaching positions and the portion of benefits absorbed by the City of Norwalk are not included in the estimates.

### Exhibit 3
**Summary of Norwalk Public Schools Recommendations and Estimated Five-Year Fiscal Impacts**

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.0 Administration and Management</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2-1</td>
<td>Continue creating and publishing the most updated organization charts and current job descriptions to ensure proper communication of NPS’ organization structure.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-2</td>
<td>Eliminate the positions of Chief of Staff and Communication, Communications Manager, and Executive Assistant and reorganize the communications function under the Deputy Superintendent.</td>
<td>$149,500</td>
<td>$149,500</td>
<td>$149,500</td>
<td>$149,500</td>
<td>$149,500</td>
</tr>
<tr>
<td>2-4</td>
<td>Manage contracts to reduce costs of legal services to 2018-2019 levels.</td>
<td>$150,000</td>
<td>$150,000</td>
<td>$150,000</td>
<td>$150,000</td>
<td>$150,000</td>
</tr>
<tr>
<td>2-5</td>
<td>Continue to enhance performance measures within the NPS Strategic Plan.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-6</td>
<td>Ensure NPS budget documents reflect alignment to its Strategic Plan.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-7</td>
<td>Ensure the current NPS Strategic Plan is reflected on its website</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-8</td>
<td>Develop a comprehensive Administrative Regulations Manual.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>2-9</td>
<td>Continue review and document policy revisions.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Total Administration and Management</td>
<td></td>
<td>$252,965</td>
<td>$252,965</td>
<td>$252,965</td>
<td>$252,965</td>
<td>$252,965</td>
</tr>
</tbody>
</table>
### Exhibit 3 (Continued)
#### Summary of Norwalk Public Schools Recommendations and Estimated Five-Year Fiscal Impacts

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>3.0 School Financial Management</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3-1</td>
<td>Develop a plan to fully implement the MUNIS assessment and recommendations that can be done immediately, and provide the analysis and/or training sessions associated with the recommendations being implemented.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-2</td>
<td>Utilize the Newman + DLR Group facility assessment of NPS campuses to prioritize what actions to take to continue the renovation plans.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-3</td>
<td>Track all capital assets by capturing what funds they are purchased with, tagging them for proper identification after placing in use, and disposing of them with adequate documentation of the disposal.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-4</td>
<td>Centralize all activity fund transactions</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-5</td>
<td>Develop a plan now to address the sustainability of expenditures to avoid facing a funding cliff.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-6</td>
<td>Develop a plan for the Joint Education Finance Committee to meet quarterly and address specific budget questions, concerns, and ways to allocate other funds where applicable before adopting the budget.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-7</td>
<td>Include a general definition of what constitutes an emergency for the purpose of bypassing the normal competitive procurement processes.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-8</td>
<td>Work with the Comptroller’s staff to implement an electronic process for submitting requests for payment.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>3-9</td>
<td>Develop a comprehensive Procedures Manual for the Finance Department</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td></td>
<td><strong>Total School Financial Management</strong></td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td><strong>4.0 Operations</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4-1</td>
<td>Eliminate the $400,000 limit in City ordinance §30-15.1 for capital construction projects and require the City and NPS coordinate to identify the best division of work based on available resources.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Rec. #</td>
<td>Recommendation</td>
<td>2022-23</td>
<td>2023-24</td>
<td>2024-25</td>
<td>2025-26</td>
<td>2026-27</td>
</tr>
<tr>
<td>-------</td>
<td>--------------------------------------------------------------------------------</td>
<td>---------</td>
<td>---------</td>
<td>---------</td>
<td>---------</td>
<td>---------</td>
</tr>
<tr>
<td>4-2</td>
<td>Incorporate the facilities maintenance recommendations from facilities and other studies into the maintenance work schedule.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-3</td>
<td>Require all work orders to be included in the Workspeed work order management system and prioritize based on a rating system that ranks health and safety issues above all other requests.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-4</td>
<td>Improve management of the Workspeed Maintenance Work Order System to maximize the efficient use of the system.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-5</td>
<td>Contract for facilities maintenance services for all NPS buildings</td>
<td>($450,000)</td>
<td>($450,000)</td>
<td>($450,000)</td>
<td>($450,000)</td>
<td>($450,000)</td>
</tr>
<tr>
<td>4-6</td>
<td>Identify, record, and regularly inventory the supplies stored in the Briggs Building, and explore other options for a warehouse with improved security of the stored items.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-7</td>
<td>Assign key management to principals to ensure control for the rooms in their building</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-8</td>
<td>Develop a Facilities Department Procedures and Safety Manual.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-9</td>
<td>Document the 25-foot maintenance requirement with the City and open lines of communication regarding special needs and areas where better coordination will benefit both groups.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-10</td>
<td>Develop a consistent facility rental form and process for both the City and NPS</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-11</td>
<td>Hire an Associate or Assistant to work with the Transportation Logistics Administrator and document the processes and procedures as the individual is trained.</td>
<td>($91,000)</td>
<td>($91,000)</td>
<td>($91,000)</td>
<td>($91,000)</td>
<td>($91,000)</td>
</tr>
<tr>
<td>4-12</td>
<td>Ensure that traffic patterns and congested roadways are considered, when planning transportation services for existing and new campuses and set adjusted bell times accordingly.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-13</td>
<td>Add material to the NPS website on school bus rules and regulations as well as school bus safety.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>
### Exhibit 3 (Continued)

**Summary of Norwalk Public Schools Recommendations and Estimated Five-Year Fiscal Impacts**

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>4-14</td>
<td>Install Wi-Fi on three to five buses and provide student internet assignments over a grading period to determine if there is a positive behavioral change.</td>
<td>($15,000)</td>
<td>($1,500)</td>
<td>($1,500)</td>
<td>($1,500)</td>
<td>($1,500)</td>
</tr>
<tr>
<td>4-15</td>
<td>Explore the feasibility of installing stop-arm cameras on school buses to increase student safety and potentially generate revenues for the District.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>4-16</td>
<td>Realign staff members, roles and responsibilities within the Health Services Department to reduce some administrative burden from the Coordinator</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td></td>
<td><strong>Total School Operations</strong></td>
<td>($556,000)</td>
<td>($542,500)</td>
<td>($542,500)</td>
<td>($542,500)</td>
<td>($542,500)</td>
</tr>
<tr>
<td>5.0</td>
<td><strong>Human Resources</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5-1</td>
<td>Hire an additional HR Generalist position to reduce the current workload.</td>
<td>($84,500)</td>
<td>($84,500)</td>
<td>($84,500)</td>
<td>($84,500)</td>
<td>($84,500)</td>
</tr>
<tr>
<td>5-2</td>
<td>Work with the School Board liaison to identify personnel policies needing revision, and refer the recommended changes to the School Board for review and approval.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>5-3</td>
<td>Compile a benefit guide that not only shows the many benefits provided by NPS, but also provides contact information and links to where additional information can be found.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>5-4</td>
<td>Develop language that gives management the authority to implement a fair, honest and open performance evaluation system that emphasizes the goal of continual improvement, as union contracts are renegotiated.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td></td>
<td><strong>Total Human Resources</strong></td>
<td>($84,500)</td>
<td>($84,500)</td>
<td>($84,500)</td>
<td>($84,500)</td>
<td>($84,500)</td>
</tr>
<tr>
<td>6.0</td>
<td><strong>School Information Technology</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6-1</td>
<td>Develop a collaborative approach for providing technical support to NPS and City users.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>6-2</td>
<td>Hire three additional full-time Instructional Coaches to support educational technology and one additional full-time IT Technician.</td>
<td>($386,216)</td>
<td>($386,216)</td>
<td>($386,216)</td>
<td>($386,216)</td>
<td>($386,216)</td>
</tr>
</tbody>
</table>
### Exhibit 3 (Continued)
**Summary of Norwalk Public Schools Recommendations and Estimated Five-Year Fiscal Impacts**

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>6-3</td>
<td>Develop and implement a three-year education technology plan.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td></td>
<td><strong>Total School Information Technology</strong></td>
<td>$(386,216)</td>
<td>$(386,216)</td>
<td>$(386,216)</td>
<td>$(386,216)</td>
<td>$(386,216)</td>
</tr>
</tbody>
</table>

#### 7.0 Educational Operating Efficiency

<table>
<thead>
<tr>
<th>Rec. #</th>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>7-1</td>
<td>Consistently report total staffing numbers, including staff paid from all sources.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-2</td>
<td>Establish a process whereby Principals have additional input into the budget creation process, including the identification of capital budget needs within their schools.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-3</td>
<td>Develop a staffing plan to establish educationally sound, but more efficient teacher and paraprofessional staffing guidelines, particularly at the elementary level.</td>
<td>$1,719,694</td>
<td>$1,719,694</td>
<td>$1,719,694</td>
<td>$1,719,694</td>
<td>$1,719,694</td>
</tr>
<tr>
<td>7-4</td>
<td>During the next contract negotiation process, organize and simplify the extra duty pay categories and search for ways to immediately begin reducing total costs.</td>
<td>$1,500,000</td>
<td>$500,000</td>
<td>$500,000</td>
<td>$500,000</td>
<td>$500,000</td>
</tr>
<tr>
<td>7-5</td>
<td>Document in policy or procedure the process for justifying both contract services and the creation of new positions, which examines the full cost and benefits of both options.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>7-6</td>
<td>Establish a joint City/BOE working group to carefully review how the ESSER funds were used and identify the areas where these funds were used to supplant ongoing operations.</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>

#### Grand Total Net Savings (Costs)

<table>
<thead>
<tr>
<th></th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Total Educational Operating Efficiency</strong></td>
<td>$3,219,694</td>
<td>$2,219,694</td>
<td>$2,219,694</td>
<td>$2,219,694</td>
<td>$2,219,694</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>GRAND TOTAL NET SAVINGS (COSTS)</strong></td>
<td>$2,445,943</td>
<td>$1,459,443</td>
<td>$1,459,443</td>
<td>$1,459,443</td>
<td>$1,459,443</td>
</tr>
</tbody>
</table>
CITY OF NORWALK
Efficiency Study of the City of Norwalk

FINAL REPORT

Submitted by:

Evergreen Solutions, LLC
2878 Remington Green Circle
Tallahassee, Florida  32308

March 22, 2022
TABLE OF CONTENTS

Efficiency Study of the City of Norwalk

CHAPTER 1: INTRODUCTION ...............................................................................................1

1.1 Methodology .....................................................................................................................1
1.2 Comparison Cities .............................................................................................................3

CHAPTER 2: ADMINISTRATION AND MANAGEMENT .................................................7

2.1 Governance .......................................................................................................................9
2.2 Organization and Management Structure .................................................................18
2.3 Legal Services .................................................................................................................25
2.4 Office of the Town Clerk ...............................................................................................28
2.5 Office of the City Clerk ................................................................................................35
2.6 Strategic Planning ...........................................................................................................43
2.7 Charter, Ordinances, and Procedures ...........................................................................46

CHAPTER 3: FINANCIAL MANAGEMENT .......................................................................51

3.1 Financial Management and Accounting .........................................................................52
3.2 Comptroller/Investments/Payroll ....................................................................................58
3.3 Management and Budgets ...............................................................................................62
3.4 Bond Issuance and Indebtedness ....................................................................................71
3.5 Tax Assessor/Collector ...................................................................................................72
3.6 Purchasing .......................................................................................................................79
3.7 Accounts Payable ............................................................................................................98
3.8 Policies and Procedures ................................................................................................104

CHAPTER 4 HUMAN RESOURCES ..................................................................................106

4.1 Organization and Management .....................................................................................106
4.2 Personnel Policies and Procedures ................................................................................109
4.3 Pension and Benefits ....................................................................................................115
4.4 Recruitment, Hiring, and Retention ..............................................................................120
4.5 Labor Relations .............................................................................................................125
4.6 Performance Evaluation ...............................................................................................127

CHAPTER 5: COMMUNITY SERVICES .............................................................................130

5.1 Management and Organization ....................................................................................130
5.2 Health Department ........................................................................................................138
5.3 Library ..........................................................................................................................140
5.4 Human Services Department .......................................................................................144
5.5 Human Relations and Fair Rent ...................................................................................147
# TABLE OF CONTENTS

*Efficiency Study of the City of Norwalk*

## PAGE

### CHAPTER 6: PUBLIC SAFETY ................................................................. 149

6.1 Public Safety Organization and Management .................................................. 150  
6.2 Combined Dispatch ......................................................................................... 164  
6.3 Police Department .......................................................................................... 171  
6.4 Fire Department ............................................................................................... 183  

### CHAPTER 7: ECONOMIC AND COMMUNITY DEVELOPMENT ............... 191

7.1 Organization and Management ......................................................................... 191  
7.2 Building and Code Enforcement ....................................................................... 208  
7.3 Business Development and Tourism ............................................................... 215  
7.4 Planning and Zoning ......................................................................................... 221  
7.5 Transportation, Mobility and Parking ............................................................... 224  

### CHAPTER 8: OPERATIONS AND PUBLIC WORKS .................................. 237

8.1 Organization and Management ......................................................................... 238  
8.2 Strategy .............................................................................................................. 245  
8.3 Engineering Department .................................................................................... 248  
8.4 Operations Department ...................................................................................... 251  
8.5 Norwalk Water Pollution Control Authority (WPCA) ....................................... 253  
8.6 Facilities Department .......................................................................................... 256  
8.7 Recreation and Parks Department ....................................................................... 258  

### CHAPTER 9: INFORMATION TECHNOLOGY ............................................ 262

9.1 Organization and Management ......................................................................... 262  
9.2 Strategy .............................................................................................................. 271  
9.3 Operations .......................................................................................................... 278
In October 2021, Evergreen Solutions, LLC was retained by the City of Norwalk, Connecticut, to conduct an Efficiency Study of both City and School operations. The study was intended to focus on the organizational, operational, and financial efficiency and effectiveness of City and School operations.

1.1 METHODOLOGY

Evergreen’s methodology for conducting the Efficiency Study was divided into two distinct phases – Phase I (project initiation and diagnostic review) and Phase II (in-depth analysis and reporting). The two phases were further disaggregated into several tasks, including the following:

**Phase I**

- initiating the project;
- collecting and reviewing existing reports and data sources; and
- conducting a diagnostic review, including interviews with City Council members, City leaders, and department heads.

**Phase II**

- performing analyses and benchmarking with comparison cities and best practice research;
- conducting the formal in-depth study with Evergreen consultants;
- formulating findings and recommendations; and
- preparing the draft and final reports.

Project Initiation

Project initiation included the initial step of developing a comprehensive understanding of City operations—including all departments and functional areas. Working with City leaders, Evergreen finalized the project timeline, work plan, and deliverables during this task. In addition, key projects stakeholders were identified and contact information was provided to Evergreen to establish effective lines of communication to be used throughout the study.
Review of Existing Reports and Data Sources

Initially, Evergreen provided the City a list of data needs by department area. Staff responded to the request by placing the requested documents in an on-line folder created by the City’s Information Technology staff. Consultants examined the City data provided and sought other existing reports and data sources that provided us with information related to the various administrative functions and operations to be reviewed in the City.

Examples include, but are not limited to the following:

- policies and administrative procedures;
- organizational charts of each department;
- program and compliance reports;
- strategic and departmental plans;
- mission, vision, goals, objectives and performance standards;
- annual performance reports;
- independent financial audits;
- annual budget and expenditure reports;
- job descriptions;
- technology data;
- staffing data;
- salary schedules; and
- employee handbook.

Data were analyzed from each of these sources and others, and the information was used as a starting point for collecting additional data.

Diagnostic Review

Diagnostic interviews with City of Norwalk staff were conducted via phone and Zoom meetings during the first two weeks in November 2021. Evergreen consultants interviewed, City leaders, department heads, and other employees concerning the management and operations of the City. Following the elections, Evergreen’s consultants interviewed nine of the Common Council Members either in person or by phone during the first two weeks in December.

In-Depth Review

The Evergreen Team conducted the formal review of City’s operations between November 15, 2021 and January 2022 through a series of on-site visits, phone interviews and Zoom meetings. As part of the in-depth review, the following broad areas, systems and operations were examined:

- Administration and Management
  - Corporate Counsel
  - Mayor and Central Organization
  - City and Town Clerk
- Financial Management
Introduction

Efficiency Study of the City of Norwalk

- Human Resources
- Community Services
- Public Safety
- Economic and Community Development
- Operations and Public Works
- Information Technology

It is important to note that within the areas reviewed, Evergreen focused its in-depth study on each of the key functions found in the RFP. Where the diagnostic interviews identified areas of significant need, Evergreen consultants focused attention on those areas and performed extensive analysis to determine the root cause and possible solutions.

Prior to conducting the in-depth review, each team member was provided with an extensive set of information about the City operations. Evergreen Team members then conducted a detailed efficiency analysis of the structure and operations in their assigned functional areas.

Remote and in-person interviews, observations and document reviews occurred from November 2021 through February 2022.

Creating the Final Report

On February 16, City leaders and designated staff were provided an initial draft of the City portion of the report to validate the accuracy of findings. On February 24, Evergreen met in person with each group by chapter and during this one-day on-site session and during a series of follow-up meetings and calls, the findings were reviewed for accuracy and completeness. Changes to the draft were made when the accuracy of the data was in question, additional data or information was provided, or circumstances had changed since the time of the initial on-site work. Documentation to support those changes were obtained and verified prior to incorporating the information into the final report.

On Tuesday, March 22, the final report, including the City and NPS sections were delivered to a meeting of the Common Council and Board of Education.

1.2 COMPARISON CITIES

For the purpose of comparative analysis, Evergreen identified, with the assistance and approval of the Mayor, Chief of Staff and City’s Project Manager, a blend of Connecticut and national cities that possess similar demographic characteristics to the City. Preliminary analysis examined these peer cities to determine points of comparison, best practices, and operational needs for the City of Norwalk. Peer cities were:

- Newton, MA
- Lynchburg, VA
- Nashua, NH
- Cranston, RI
- Longmont, CO
Because the peers are physically located around the country, the majority of information was obtained via phone and email surveys. Where data were not found or the peer was unable to respond, the field will show ‘no response’ (NR)

A comparison of municipal population and growth rates in peer cities is shown in Exhibit 1-1. Exhibit 1-2 looks at the staffing ratios, and Exhibit 1-3 provides property tax comparisons.

As shown in Exhibit 1-1, the City of Norwalk’s population is in line with the peer’s and the City’s growth rate at 6.5 percent is slightly above the peer average.

### Exhibit 1-1
**Municipal Population and Growth Rate with Study Comparison Peers**

<table>
<thead>
<tr>
<th>City</th>
<th>2010 Population</th>
<th>2020 Population</th>
<th>Percent Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk, CT</td>
<td>85,603</td>
<td>91,184</td>
<td>6.5%</td>
</tr>
<tr>
<td>Newton, MA</td>
<td>85,146</td>
<td>88,923</td>
<td>4.4%</td>
</tr>
<tr>
<td>Lynchburg, VA</td>
<td>75,568</td>
<td>79,009</td>
<td>4.6%</td>
</tr>
<tr>
<td>Nashua, NH</td>
<td>86,494</td>
<td>91,322</td>
<td>5.6%</td>
</tr>
<tr>
<td>Cranston, RI</td>
<td>80,387</td>
<td>82,934</td>
<td>3.2%</td>
</tr>
<tr>
<td>Longmont, CO</td>
<td>86,270</td>
<td>98,885</td>
<td>14.6%</td>
</tr>
<tr>
<td>Framingham, MA</td>
<td>68,318</td>
<td>72,362</td>
<td>5.9%</td>
</tr>
<tr>
<td>Santa Barbara, CA</td>
<td>88,410</td>
<td>88,665</td>
<td>0.3%</td>
</tr>
<tr>
<td>Stamford, CT</td>
<td>122,643</td>
<td>135,470</td>
<td>10.5%</td>
</tr>
<tr>
<td>New Haven, CT</td>
<td>129,779</td>
<td>134,023</td>
<td>3.3%</td>
</tr>
<tr>
<td>Waterbury, CT</td>
<td>110,366</td>
<td>114,403</td>
<td>3.7%</td>
</tr>
<tr>
<td>Danbury, CT</td>
<td>80,893</td>
<td>86,518</td>
<td>7.0%</td>
</tr>
<tr>
<td><strong>Average (w/o Norwalk)</strong></td>
<td><strong>92,207</strong></td>
<td><strong>97,501</strong></td>
<td><strong>5.8%</strong></td>
</tr>
</tbody>
</table>

Source: Compiled by Evergreen, January 2022.

Exhibit 1-2 shows that, with the exception of Santa Barbara, it appears that Norwalk and the City of Danbury exceed the resident per full-time employee ratio—meaning that the City employs fewer full-time staff than most of its peers in relationship to the total population.
Norwalk’s tax rate appears lower than its peers. It should be noted, however, that the tax rates in other states may be administered differently and may not be strictly comparable to the taxing methodologies in Connecticut.

As can be seen, the City possesses many similarities to the group of peer cities based on the comparison data in the exhibit. This process of comparison, albeit more in-depth, was used to not only to select peer comparison cities, but throughout the report, to benchmark the City of Norwalk against its peers.
Benchmarking data were derived from both readily available sources, such as the national and state databases, as well as from data collected through direct contact with the peer cities. As such, Evergreen evaluators took great care in ensuring data were accurate. However, in some instances, peer cities reported data that can only be confirmed to a certain extent, and therefore some inconsistencies may exist between reported data and actual operational data. Nonetheless, this type of benchmarking is customary and considered best practice in conducting efficiency studies.
CHAPTER 2:  
ADMINISTRATION AND MANAGEMENT
Chapter 2 reviews the staffing, organization, and management of the City of Norwalk, Connecticut and is divided into the following seven sections:

2.1 Governance
2.2 Organization and Management
2.3 Legal Services
2.4 Office of the Town Clerk
2.5 Office of the City Clerk
2.6 Strategic Planning
2.7 Charter, Ordinances, and Procedures

The administration and management of a municipal government involves cooperation and communication among the members of the governance board or council and the administration and staff who carry out their individual roles and responsibilities.

Exhibit 2-1 provides an overview of the City’s overall governance and administrative structure.

Source: Compiled by Evergreen, December 2021.
The City of Norwalk's municipal government is a shared mayor-council government with the Mayor and Common Council of Norwalk elected by its voters. The City's Charter gives certain administrative powers exclusively to the Common Council (Council) and others jointly to the Council and Mayor.

Exhibits 2-2 and 2-3 compare Norwalk’s population to a selected group of peers.

Exhibit 2-2

Full-Time Employee to Population Ratio – 2021

<table>
<thead>
<tr>
<th>City</th>
<th>Population†</th>
<th>Full-Time Employees</th>
<th>Residents per Full-Time Employee</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk, CT</td>
<td>91,184</td>
<td>661</td>
<td>137.9</td>
</tr>
<tr>
<td>Newton, MA</td>
<td>88,923</td>
<td>3,000</td>
<td>29.6</td>
</tr>
<tr>
<td>Lynchburg, VA</td>
<td>79,009</td>
<td>1,162</td>
<td>68.0</td>
</tr>
<tr>
<td>Nashua, NH</td>
<td>91,322</td>
<td>2,598</td>
<td>35.2</td>
</tr>
<tr>
<td>Cranston, RI</td>
<td>82,934</td>
<td>2,185</td>
<td>38.0</td>
</tr>
<tr>
<td>Longmont, CO</td>
<td>98,885</td>
<td>1,012</td>
<td>97.7</td>
</tr>
<tr>
<td>Framingham, MA</td>
<td>72,362</td>
<td>736</td>
<td>98.3</td>
</tr>
<tr>
<td>Santa Barbara, CA</td>
<td>88,665</td>
<td>927</td>
<td>95.6</td>
</tr>
<tr>
<td>Stamford, CT</td>
<td>135,470</td>
<td>428</td>
<td>316.5</td>
</tr>
<tr>
<td>New Haven, CT</td>
<td>134,023</td>
<td>1,370</td>
<td>97.8</td>
</tr>
<tr>
<td>Waterbury, CT</td>
<td>114,403</td>
<td>3,063</td>
<td>37.3</td>
</tr>
<tr>
<td>Danbury, CT</td>
<td>86,518</td>
<td>554</td>
<td>156.2</td>
</tr>
<tr>
<td>Average (w/o Norwalk)</td>
<td>97,501</td>
<td>1,549</td>
<td>97.3</td>
</tr>
</tbody>
</table>

Source: Compiled by Evergreen through survey, January 2022.

Exhibit 2-3

City Population and Growth Rate

<table>
<thead>
<tr>
<th>City</th>
<th>2010 Population</th>
<th>2020 Population</th>
<th>Percent Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk, CT</td>
<td>85,603</td>
<td>91,184</td>
<td>6.5%</td>
</tr>
<tr>
<td>Newton, MA</td>
<td>85,146</td>
<td>88,923</td>
<td>4.4%</td>
</tr>
<tr>
<td>Lynchburg, VA</td>
<td>75,568</td>
<td>79,009</td>
<td>4.6%</td>
</tr>
<tr>
<td>Nashua, NH</td>
<td>86,494</td>
<td>91,322</td>
<td>5.6%</td>
</tr>
<tr>
<td>Cranston, RI</td>
<td>80,387</td>
<td>82,934</td>
<td>3.2%</td>
</tr>
<tr>
<td>Longmont, CO</td>
<td>86,270</td>
<td>98,885</td>
<td>14.6%</td>
</tr>
<tr>
<td>Framingham, MA</td>
<td>68,318</td>
<td>72,362</td>
<td>5.9%</td>
</tr>
<tr>
<td>Santa Barbara, CA</td>
<td>88,410</td>
<td>88,665</td>
<td>0.3%</td>
</tr>
<tr>
<td>Stamford, CT</td>
<td>122,643</td>
<td>135,470</td>
<td>10.5%</td>
</tr>
<tr>
<td>New Haven, CT</td>
<td>129,779</td>
<td>134,023</td>
<td>3.3%</td>
</tr>
<tr>
<td>Waterbury, CT</td>
<td>110,366</td>
<td>114,403</td>
<td>3.7%</td>
</tr>
<tr>
<td>Danbury, CT</td>
<td>80,893</td>
<td>86,518</td>
<td>7.0%</td>
</tr>
<tr>
<td>Average (w/o Norwalk)</td>
<td>92,207</td>
<td>97,501</td>
<td>5.8%</td>
</tr>
</tbody>
</table>

Source: Compiled by Evergreen, January 2022.

As shown, the City’s population is growing at a slightly higher rate than its peers, but is operating with fewer City employees per resident than its peers.
2.1 GOVERNANCE.

The Common Council is the legislative body of the City of Norwalk. Norwalk's Common Council consists of 15 Council members, five elected at-large and ten elected by district—two from each district. Each Common Council member is elected to a two-year term and each is paid $50 per month for their service. The Council meets on the second and fourth Tuesday of each month and, during COVID, all meetings have been held virtually.

Exhibit 2-4 shows the individuals holding each position and the individuals elected by the Council to the position of President and the Majority Leaders that are appointed during the first meeting of the Council following the election.

Exhibit 2-4
Common Council Structure

<table>
<thead>
<tr>
<th>Common Council Member</th>
<th>District or At Large</th>
<th>Positions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Nicol D Ayers</td>
<td>District A</td>
<td></td>
</tr>
<tr>
<td>David Heuvelman</td>
<td>District A</td>
<td></td>
</tr>
<tr>
<td>Diana Revolus</td>
<td>District B</td>
<td></td>
</tr>
<tr>
<td>Darlene Young</td>
<td>District B</td>
<td></td>
</tr>
<tr>
<td>John Kydes</td>
<td>District C</td>
<td></td>
</tr>
<tr>
<td>Jenn McMurrer</td>
<td>District C</td>
<td></td>
</tr>
<tr>
<td>Heidi Alterman</td>
<td>District D</td>
<td></td>
</tr>
<tr>
<td>Thomas M Keegan</td>
<td>District D</td>
<td>Republican Minority Leader</td>
</tr>
<tr>
<td>Tom Livingston</td>
<td>District E</td>
<td>Council President</td>
</tr>
<tr>
<td>Margaret (Lisa) Shanahan</td>
<td>District E</td>
<td></td>
</tr>
<tr>
<td>Greg Burnett</td>
<td>At Large</td>
<td></td>
</tr>
<tr>
<td>Dominique Johnson</td>
<td>At Large</td>
<td></td>
</tr>
<tr>
<td>Barbara Smyth</td>
<td>At Large</td>
<td>Democratic Majority Leader</td>
</tr>
<tr>
<td>Nora Niedzielski-Eichner</td>
<td>At Large</td>
<td></td>
</tr>
<tr>
<td>Heidi Alterman</td>
<td>At Large</td>
<td></td>
</tr>
</tbody>
</table>

Source: City Clerk, December 2021.

Standing Committees of the Council are also established following each election cycle and are shown in Exhibit 2-5 for the First Year of the 2021 to 2023 time period.

Each of the Committees is assigned to work with staff members representing the department(s) answering to the committee. Below is a general description of the charge of each committee.
### Exhibit 2-5
Common Council Committees

<table>
<thead>
<tr>
<th>COMMON COUNCIL COMMITTEES 2021 - 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>FIRST YEAR</strong></td>
</tr>
<tr>
<td>Tom Livingston, Council President</td>
</tr>
<tr>
<td>Barbara Smyth, Majority Leader</td>
</tr>
<tr>
<td>Tom Keegan, Minority Leader</td>
</tr>
</tbody>
</table>

#### FINANCE & CLAIMS
2nd Thursday: 7:00 p.m., Common Council Chambers
- GREG BURNETT, CHAIR
- DAVID HEUVELMAN
- TOM KEEGAN
- JOHN KYDES
- JENN McMURRER
- NORA NIEDZIELSKI-EICHNER
- DIANA REVOLUS

#### PUBLIC SAFETY & GENERAL GOVERNMENT*
4th Thursday: 7:00 p.m., Room 231
- JENN McMURRER, CHAIR
- HEIDI ALTERMAN
- NICOL AYERS
- JOSH GOLDSTEIN
- DOMINIQUE JOHNSON
- TOM KEEGAN
- DIANA REVOLUS

#### LAND USE & BUILDING MANAGEMENT
1st Wednesday: 7:00 p.m., Room 231
- TOM LIVINGSTON, CHAIR
- HEIDI ALTERMAN
- NICOL AYERS
- GREG BURNETT
- DAVID HEUVELMAN
- TOM KEEGAN
- BARBARA SMYTH

#### ORDINANCE
3rd Tuesday: 7:00 p.m., Room 231
- LISA SHANAHAN, CHAIR
- JOSH GOLDSTEIN
- DAVID HEUVELMAN
- DOMINIQUE JOHNSON
- TOM KEEGAN
- TOM LIVINGSTON
- NORA NIEDZIELSKI-EICHNER

#### COMMUNITY SERVICES*
3rd Wednesday, 7:00 p.m., Room 123
- DOMINIQUE JOHNSON, CHAIR
- HEIDI ALTERMAN
- NICOL AYERS
- GREG BURNETT
- TOM KEEGAN
- DIANA REVOLUS
- BARBARA SMYTH

#### ECONOMIC AND COMMUNITY DEVELOPMENT**
1st Thursday: 7:00 p.m., Room 231
- JOHN KYDES, CHAIR
- DAVID HEUVELMAN
- TOM KEEGAN
- TOM LIVINGSTON
- LISA SHANAHAN
- BARBARA SMYTH
- DARLENE YOUNG

#### PUBLIC WORKS
1st Tuesday: 7:00 p.m., DPW Conf. Room
- BARBARA SMYTH, CHAIR
- DOMINIQUE JOHNSON
- TOM KEEGAN
- TOM LIVINGSTON
- NORA NIEDZIELSKI-EICHNER
- LISA SHANAHAN
- DARLENE YOUNG

#### RECREATION, PARKS & CULTURAL AFFAIRS
2nd Wednesday: 7:00 p.m., Room 231
- DARLENE YOUNG, CHAIR
- NICOL AYERS
- JOSH GOLDSTEIN
- TOM KEEGAN
- JOHN KYDES
- JENN McMURRER
- LISA SHANAHAN

Source: City Clerk, January 2022.
**Finance and Claims:** Meetings held 2\textsuperscript{nd} Thursday: 7:00 PM

Work directly with the Office of the Chief Financial Officer to review and approve items of a financial nature and make recommendations to the Common Council for final approval. Key actions include the review of the operating budget, operating budget cap recommendation, tax collection and assessment, special appropriations, overseeing expenditures, and the purchasing of goods and services.

**Land Use and Building Management:** Meetings held 1\textsuperscript{st} Wednesday: 7:00 PM

Work directly with the Building/Facilities Manager to review and approve items related to the maintenance of city buildings, including city school buildings, and make recommendations to the Common Council for final approval. Review and approve the use of city property, construction of city buildings, and acquiring or disposing of city land.

**Community Services:** Meetings held 3\textsuperscript{rd} Wednesday: 7:00 PM

Work directly with the Office of the Chief of Community Services to review and approve items that directly affect the social well-being of the residents of Norwalk, including items related to public health, human relations, city libraries, human services and early childhood and youth services, and make recommendations to the Common Council for final approval.

**Public Works:** Meetings held 1\textsuperscript{st} Tuesday: 7:00 PM

Work directly with the Office of the Chief of Operations and Public Works to review and approve the maintenance and repair of the infrastructure owned and operated by the city and make recommendations to the Common Council for final approval. Review and approve street and highway maintenance; storm water management; engineering; capital construction; solid waste collection and disposal; recycling; traffic management; wastewater collection and treatment; parking facilities and services; and tree management.

**Public Safety and General Government:** Meetings held 4\textsuperscript{th} Thursday: 7:00 PM

Work directly with the Chief of Police and Fire Chief to review and approve items related to police department items related to public safety, police staffing and administration, and fire department items related to public safety, fire staffing and administration and make recommendations to the Common Council for final approval. Review and approve actions from the Director of Human Resources related to compensation plans, employee benefit programs, participate in candidate interviews and selection, collective bargaining agreements and grievances, job descriptions and classifications.

**Ordinance:** Meetings held 3\textsuperscript{rd} Tuesday: 7:00 PM

Work directly with the Office of the Corporate Counsel to review and approve items related to the city ordinances which are the local laws of the city duly enacted by the Common Council prescribing general, uniform and permanent rules of conduct within city limits and make recommendations to the Common Council for final approval.
**Economic and Community Development:** Meetings held 1st Thursday: 7:00 PM

Work directly with the Office of the Chief of Economic and Community Development to review and approve items related to growth and development in the city. This includes planning studies related to traffic, parking, housing, urban design, mobility, resiliency, economic development, and establishing the long-term vision for the city by implementing the goals outlined in the Plan of Conversation and Development (POCD) and make recommendation to the Common Council for final approval.

**Recreation, Parks and Cultural Affairs:** Meetings held 2nd Wednesday: 7:00 PM

Work directly with the Director of Recreations and Parks to review and approve items related to programs, events, capital projects, fees, and permits within city parks and facilities, and make recommendations to the Common Council for final approval.

**FINDING**

In November 2021, in anticipation of the elections, the Common Council finalized an Orientation Handbook designed to orient new Council members on the City management structure and their roles and responsibilities as Council Members.

During interviews with a number of the Council Members, the process for developing this Handbook was coordinated by two tenured Council Members who recognized that gaining an understanding of how the City works took new Council Members at least a year to absorb. Further, many newer members applied their own interpretation to the roles and responsibilities which caused the administration as well as other Council Members some concern.

Several of the members interviewed also commented on the fact that the Charter, Ordinances and Codes were often hard to navigate. The Handbook, they stated, summarizes key pieces of the information in a way that is understandable and easy to find.

As shown in Exhibit 2-6, the Handbook contains information regarding the roles and responsibilities of each of the major departments within the City, and then provides additional detail on the Council-related activities.
Serving as a Common Council Member can be a difficult and thankless job as the position is constantly in front of the public and there will always be critics. Having a Handbook to fall back on as a resource can help to mitigate that criticism and answer questions for constituents regarding what a Common Council Member can and cannot do.

**COMMENDATION**

The Common Council Handbook contains a wealth of information for new and tenured Council members on the organizational structure of City Government and the Council’s role as the legislative arm of the City.
FINDING

A lack of clarity in the lines of authority may result in Council Committees assuming a management role over City staff.

The understanding of the Common Council’s authority regarding the management of administrative staff is partially convoluted by statements made in the Charter relating their role [emphasis added]:

§ 1-189 Powers of the Council in general.

(Sp. Laws 1913, No. 352, § 80; Sp. Laws 1921, No. 400, § 3; Sp. Laws 1929, No. 82, § 3.)

The Council shall have power to make, alter, repeal and enforce ordinances, to pass and rescind resolutions, rules, votes and orders and to take such action as may be necessary or expedient … to manage and control the finances and property, real and personal, of the city...to fix the salaries and the compensation of all officers and employees of said city, and to prescribe the duties of said officers and employees...

§ 1-189.2 Authorization of Council to reorganize certain departments.

The Council shall have the power to establish, reorganize and consolidate departments, agencies, commissions, authorities and boards of the city, hereinafter referred to as administrative departments. Provided, however, there shall be a Department of Health, a Department of Public Works and a Department of Public Welfare. The Council shall have the power to establish and amend by ordinance such rules, regulations, policies and procedures as it may deem necessary or appropriate to define and govern the powers, duties, responsibilities and operations of such administrative departments. Said powers of the Council shall apply to all administrative departments, including but not limited to all administrative departments in existence at the effective date of this section, whether established by Charter, Special Act, or ordinance; and ordinances enacted by the Council pursuant to this section shall supersede any prior inconsistent provisions of this Charter, Special Acts or ordinances.

B. This section shall not apply to (1) any elected departments, agencies, commissions, authorities or boards, including those elected by taxing districts; (2) the Police Department or its boards or commissions; (3) the Fire Department or its boards or commissions; (4) the Planning Commission; (5) the Zoning Commission; (6) the Board of Estimate and Taxation; (7) the Comptroller; (8) the Corporation Counsel.

Common Council Committees approve ordinances to outline the duties of various departments. For example, when the new Chief positions were created, an ordinance outlining the roles and responsibilities of the new Community Service Department was passed by the Common Council as shown below.

Chapter 33 Community Services Department

§ 33-1 Office established.
On and after the effective date hereof there shall be a Chief of Community Services of the City of Norwalk, who shall have all of the powers, duties and responsibilities hereinafter set forth in the chapter and in the position description for the Chief of Community Services of the City of Norwalk as adopted and amended from time to time.

§ 33-2Appointment of Chief.

The head of the department shall be the Chief of Community Services. The Mayor is hereby authorized to appoint and hire a Chief of Community Services who shall be subject to confirmation by the Common Council. The Chief of Community Services shall serve at the pleasure of the Mayor and may be removed at any time by the Mayor at his/her discretion. The compensation and benefits of the Chief of Community Services shall be detailed in the position description as adopted and amended from time to time.

§ 33-3Duties.

A. Generally, provides assistance to the Mayor on City issues concerning community services.

B. The Chief shall be responsible for initiating, developing and implementing policies that are outlined in the position description entitled "Chief of Community Services." The Chief will act as a liaison to state and federal agencies dealing with the areas addressed in the position description. The Chief will also perform such other related activities as may be assigned from time to time by the Mayor or the Common Council.

C. The Chief of Community Services shall have the general supervision of the operation and management of the several units of the Department. The Chief shall be responsible for the presentation of a consolidated budget to the Common Council; the supervision of all employees of the Department and the preparation of an annual report of the activities of the entire Department of Community Services.

Authorizing the creation of a department or position, and outlining that department’s role and responsibility, are clearly within the authority and purview of the Common Council. Management of the day-to-day operations of the department rests with the Mayor and his or her staff.

A review of Committee minutes revealed that considerable time is spent on project reports and technical corrections. This creates the opportunity for the Committee members to step into a management role.

Each month, staff compile progress reports on most projects, and it is during this reporting period that Council members asked staff very detailed and directed questions about the management and direction of each project. During staff interviews, managers and directors indicated that this question-and-answer session often delves deep into the type and number of staff working on each project, as well as detailed questioning of the type of materials used and the like. Often a clerical support person is used to compile this information and as a result, receives calls and requests directly from members asking for information or data unrelated to the agenda packet.
Staff not specifically assigned to support a Committee told the Evergreen Team that some Council members also bypass the administration and contact individual employee asking for additional information or directing them to handle a specific problem or complaint in a prescribed manner. Some interviewees said they felt intimidated by these contacts, while others said they appreciated the opportunity to speak directly with a Council Member because they felt their own management was not always responsive to their suggestions or complaints.

In many state and local governments, a protocol is documented whereby all contacts between staff and an elected official are handled. For example, some organizations channel all requests from an elected official through a communications officer where the request is prioritized, tracked and recorded to ensure that staff are responding appropriately and in a timely manner. If calls are made directly to a staff member, staff are directed to refer them to the protocol and courteously to the appropriate contact person.

**RECOMMENDATION**

**Recommendation 2-1:**

**Clarify the process for Council Members to use when requesting information or services from staff and sharing complaints.**

The protocol should be agreed to by both the Council and the Mayor and added to the Council’s Orientation Handbook. Administratively, there will need to be an individual appointed to receive and track these requests and ensure that the appropriate staff response to Common Council request in a timely manner. The Assistant City Clerk is currently the appointed liaison with the Common Council, but the assignment of tasks to the staff should be carried out under the Office of the Mayor and may be more appropriately assigned to another individual as part of their regular duties. The final decision on who to assign to handle these requests should be decided by the Mayor.

**FISCAL IMPACT**

This protocol can be developed with existing resources. Should the volume of requests be more than the assigned staff member can handle as part of their daily duties, there may be additional costs to add a position.

**FINDING**

In addition to the electronic version of the agenda packets which are sent out on the Friday prior to the meetings, the Common Council has hard copies of each agenda packets delivered to each of them individually. This is time consuming and costly for the City.

The Common Council meets on the second and fourth Tuesday of each month, and an agenda packet is delivered to them by courier on the Friday prior to the meeting. Packets contain the agenda and supporting documentation from each of the Committees relating to the items on the agenda. The Assistant City Clerk, the position that supports the Common Council, gathers all of the documentation that will be included in the packets, requesting that Committees and City staff who support each Committee provide their information no later than Thursday morning. On
Thursday morning, the Assistant City Clerk compiles all of the agenda items and produces a scanned copy of the packet and begins printing the copies of the packet for each member. Including the hard copies for the Legal Department and other administrators, approximately 30 hard copies are printed. Packets range in size from 150 to 300 pages each, and according to the Assistant City Clerk, the printing process takes through noon on Friday.

Once printed, the City has a contracted courier service that makes the deliveries. Members are then sent the electronic version via email.

Each Council member has been issued a laptop computer by the City, and although a number of the Council Members said they preferred to use their own devices, the technology is available to them for purposes of reviewing the packets. During COVID, the Council is meeting virtually, indicating that all have some level of technical expertise.

During individual interviews with a majority of the Common Council, some indicated that they preferred the hard copies as they made themselves notes on the pages where they had questions. Most in the group, stated however, that they were well aware of the information in the packet for the Committees that they currently served on, and only looked closely at the information from other committees.

The cost for printing and the investment of staff time in the printing and delivery of the packets has led many organization to revert to electronic distribution of the packets.

RECOMMENDATION

Recommendation 2-2:

Discontinue the practice of printing and delivering hard copy agenda packets to administrators and Common Council members in advance of each meeting.

If some Common Council members prefer the hard copies, the City should consider purchasing printers and providing ink and paper to the members with a need so they can print out the portion of the agenda that is of interest to them.

FISCAL IMPACT

Assuming that agendas are on average 200 pages long and they are produced 24 times per year for each of the regular meetings for 30 individuals, means that 144,000 pages are copied and printed each year. At a conservative cost of 5 cents per page in copying expense, the cost to produce these hard copies is $7,200 annually. The courier service is a contract service, and the 360 deliveries per year are included in the overall contract. If the contract could be renegotiated due to a reduction in the need for these deliveries additional savings may be possible. Although not a dollar savings, the productivity saving in staff time should be considerable.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Send Agenda Packets Electronically</td>
<td>$7,200</td>
<td>$7,200</td>
<td>$7,200</td>
<td>$7,200</td>
<td>$7,200</td>
</tr>
</tbody>
</table>
2.2 ORGANIZATION AND MANAGEMENT STRUCTURE

Although some sources refer to the City of Norwalk as having a “weak” mayor structure, the following article published by the National League of Cities defines the difference:

Cities in the United States are sometimes characterized as having either “strong” or “weak” mayors. The term is not a judgement of effectiveness, rather it distinguishes the level of political power and administrative authority assigned to the mayor in the municipal charter. In practice, there is no sharp category that distinguishes between “weak” and “strong” mayors, but rather a continuum of authority and power along which cities are spread. However, the designation of “weak” and “strong” are useful in showing the variations in mayoral authority that exist.

Most “strong” mayors are in the mayor-council form of government and are directly elected by citizens to that office. Most “weak” mayors are mayors in a council-manager form and are elected from within the city council.

Characteristics of a “strong” mayor:

- The mayor is the chief executive officer, centralizing executive power.
- The mayor directs the administrative structure, appointing and removing of department heads.
- While the council has legislative power, the mayor has veto power.
- The council does not oversee daily operations.

Characteristics of a “weak” mayor:

- The council is powerful, with both legislative and executive authority.
- The mayor is not truly the chief executive, with limited power or no veto power.
- The council can prevent the mayor from effectively supervising city administration.
- There may be many administrative boards and commissions that operate independently from the city government.

As shown, Norwalk’s Mayor has many of the characteristics of a “strong” Mayor including implied veto power. Section 1-197 of the City Code states:

Every vote, resolution, order or ordinance, except such as relates to the organization of the Council, to its own officers or employees and to the removal of the Mayor or to the declaration of a vacancy in the office of Mayor shall be transmitted to the Mayor, who shall either approve it within six days, in which case it shall become operative and effectual, or disapprove it and return it to said body at its regular meeting with a statement of his objections in writing. After such statement has been read, said Council shall proceed to reconsider its former vote on such measure. If, after such reconsideration, the Council shall again pass it by a vote of not less than 2/3 of all its members, such vote being determined by yeas and nays, it shall become operative and effectual without the approval of the Mayor. If the Mayor shall refuse or neglect to signify his approval or disapproval of any such measure.
transmitted to him within six days after its reception, such measure shall become operative and effectual as though approved by him.”

Norwalk’s Common Council has some of the characteristics described in a “weak” Mayor structure, but does not have the dominant executive authority that could circumvent the Mayor’s ability to effectively manage City operations. Therefore, a more accurate description of Norwalk’s governance structure is one of shared governance.

The administrative structure of the City is shown in Exhibit 2-7.

**Exhibit 2-7**

**Administrative Organization of the City of Norwalk**

Source: Compiled by Evergreen, December 2021.
FINDING

The current organization structure established over the last two years has reduced the Mayor's span of control to a manageable level and is an efficient structure similar to those used by similar sized peers.

Prior to the reorganization and the creation of the new Chief positions, the Mayor had 19 direct reports. The span of control was onerous, and the departments were siloed—meaning that departments with similar missions and goals were not always working together effectively. Aligning similar departments under the control of a Chief was an attempt by the administration, and supported by the Common Council, to break down the departmental barriers so that the groups would work collaboratively in the delivery of those services.

Administratively, the Chiefs report up through the Chief of Staff to the Mayor, but each is considered a direct report to the Mayor.

Exhibit 2-8 compares the City leadership salaries to the salaries for similar positions in a select group of peer organizations. While the titles in every peer organization varied, the positions represented are the highest-ranking position in that category. These salaries are not adjusted for cost of living in these locations, but as shown, the salaries are comparable in most categories.

<table>
<thead>
<tr>
<th>City</th>
<th>City/Town Manager/Mayor</th>
<th>City/Town Clerk</th>
<th>Chief Finance Officer</th>
<th>Fire Chief</th>
<th>Planning Director</th>
<th>Police Chief</th>
<th>Operations/ Public Works Director</th>
<th>Parks and Rec Director</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk, CT</td>
<td>$161,393</td>
<td>$94,775-$103,016</td>
<td>$180,622</td>
<td>$155,161</td>
<td>$166,314</td>
<td>$155,161</td>
<td>$178,561</td>
<td>$115,424-$157,948</td>
</tr>
<tr>
<td>Newton, MA</td>
<td>$125,482</td>
<td>$140,256</td>
<td>$170,498</td>
<td>$149,125</td>
<td>$136,112</td>
<td>$155,928</td>
<td>N/A</td>
<td>$127,340</td>
</tr>
<tr>
<td>Lynchburg, VA</td>
<td>$215,000</td>
<td>$103,065</td>
<td>$157,840</td>
<td>$129,591</td>
<td>$120,730</td>
<td>$149,940</td>
<td>$132,579</td>
<td>$112,334</td>
</tr>
<tr>
<td>Nashua, NH</td>
<td>$121,385</td>
<td>$104,565</td>
<td>$141,163</td>
<td>$146,392</td>
<td>$104,100</td>
<td>$156,858</td>
<td>$102,474</td>
<td>$104,566</td>
</tr>
<tr>
<td>Longmont, CO</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
</tr>
<tr>
<td>Framingham, MA</td>
<td>$187,639</td>
<td>$112,649</td>
<td>$158,265</td>
<td>$168,664</td>
<td>$118,454</td>
<td>$187,320</td>
<td>$103,551</td>
<td>$121,991</td>
</tr>
<tr>
<td>Santa Barbara, CA</td>
<td>$257,800</td>
<td>$133,959</td>
<td>$188,986</td>
<td>$203,667</td>
<td>$148,840</td>
<td>$218,396</td>
<td>$206,301</td>
<td>$183,063</td>
</tr>
<tr>
<td>Stamford, CT</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
</tr>
<tr>
<td>New Haven, CT</td>
<td>$134,013</td>
<td>$48,038</td>
<td>$129,000</td>
<td>$158,500</td>
<td>N/A</td>
<td>$169,900</td>
<td>$134,375</td>
<td>$107,500</td>
</tr>
<tr>
<td>Waterbury, CT</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
</tr>
<tr>
<td>Danbury, CT</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
</tr>
<tr>
<td>Average (w/o Norwalk)</td>
<td>$162,029</td>
<td>$103,147</td>
<td>$150,312</td>
<td>$153,160</td>
<td>$119,275</td>
<td>$166,152</td>
<td>$132,819</td>
<td>$118,986</td>
</tr>
</tbody>
</table>

Source: Compiled by Evergreen through survey, January 2022.

The areas under each of the Chief positions are discussed in considerable detail within this report, and while some recommendations are made to modify the structure under the Chiefs, the reorganization has appropriately grouped the functions in an efficient manner.
COMMENDATION

The current administration and reporting structure is appropriately organized and manageable, with similar functions reporting to a designated Chief.

FINDING

The areas under each Chief are currently called Departments and under each Department are individual Departments, which causes some confusion within the chain of command. For example, the Health Department is organizationally under the Community Services Department.

In most organizations there is a naming convention that stresses the reporting relationship. Typically, a Division is a subsection of a Department. However, in some organizations the opposite is true, with a Division being a subsection of a Department.

Because of some legal and statutory requirements, renaming some of the City Departments to make them Divisions would not be possible. For example, statutory and other considerations would prevent the renaming of the Health Department as the Health Division.

RECOMMENDATION

Recommendation 2-3:

Rename the Departments reporting to a Chief as Divisions to clarify the chain of command.

The number of changes required by this recommendation would result in the following new titles:

- Finance Division
- Human Resources and Personnel Division
- Operations and Public Works Division
- Community Services Division
- Economic and Community Development Division

Department names under the umbrella of these divisions would continue to be called departments.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The Mayor holds a meeting with his Cabinet each week, but not all of the Chiefs or key Directors are included in those discussions, leading to a breakdown in communication with key areas.
The Cabinet that meets with the Mayor weekly includes the Chief of Staff, Chief Financial Officer, Chief of Human Resources and Personnel, Chief of Community Services, Chief of Economic and Community Development, Chief of Operations and Public Works, Communications Director and Health Department Director (added due to COVID response issues). Corporate Counsel or a representative of that department has attended some meetings, but is not regularly included in the discussions.

Of particular concern was the exclusion of the Chief of Police and the Fire Chief from Cabinet-level discussions. Both of these Chiefs said they felt disconnected from the overall operations of the City and were concerned about the direct flow of information to and from the Mayor.

In addition to the Cabinet meetings, on Monday afternoons, the Mayor and Chief of Staff meet with one of the Department Chiefs and their direct reports, so that over a period of a month, the Mayor has an opportunity to meet with all departments.

As noted above, prior to the reorganization and the creation of the new Chief positions, the Mayor had 19 direct reports. The span of control was onerous, and the departments were siloed—meaning that departments with similar missions and goals were not always working together effectively. Following the reorganization, each week, the Mayor meets with the Chiefs to discuss challenges and issues within each umbrella as well as cross-cutting issues that impact the City as a whole.

Throughout the departmental interviews, Directors who are not included in these weekly discussions stated that they felt disenfranchised and the communication lines from the Chiefs to the department heads was incomplete in many instances. Each gave examples of times when they were unaware of major events that impacted them until the day or even hours before the event occurred or were surprised to learn of things after the fact.

Some municipal and governmental organizations have two levels of leadership referred to as the Cabinet and Leadership Team. Like the City, the Cabinet includes those with direct need to be in contact with the Executive Officer, and the Leadership Team including those with leadership roles and responsibilities. Meetings are held with the Cabinet frequently, but at least monthly and often every two weeks, a meeting is held with the Leadership Team to keep them apprised of the ongoing activities, challenges, and opportunities that are facing the organization.

RECOMMENDATION

Recommendation 2-4:

Implement a regularly scheduled Leadership Team meeting to improve communication and a sense of inclusion for those in a leadership role with the City.

The membership of the Cabinet and the Leadership Team should be rethought in terms of roles and responsibilities, with consideration given to including the Fire and Police Chiefs and a Corporate Council representative in the Cabinet.
FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

Communications and Customer Service are essentially the face of the City of Norwalk to most residents, but the services are not coordinated and lack the resources to perform the assigned work at a level that meets the community needs.

The Director of Communications was originally hired to perform part-time communications activities and part-time grants management activities. It became obvious that there was considerable need for better internal and external communication, and the position was elevated to a full-time communications position that reports to the Chief of Staff. This position is responsible for issuing regular notices to the public, particularly in relation to COVID, producing newsletters, uploading content to the City website, and ensuring that residents are aware of the many services provided by the City.

Support for the website is provided through a staff person in Information Technology with many other duties, and content is left to the individual departments. The individual estimates that less than 10 percent of his time is spent supporting the website. As a result, the website is difficult to navigate and, in some instances, the message being communicated to the public is inconsistent.

Customer Service is an area that also directly reports to the Chief of Staff and is responsible for handling all incoming calls to City Hall. The area was created to be a central source of information for all services provided by the City. Customer Service staff listen to the issues or requests from the callers, provide the callers direct information including forms or links to websites where possible, and only refer the caller to the department when they are unable to provide assistance. There was a working manager for the area, and two call takers assigned to this function. At the time of the study, the Manager’s position was vacant. The existing work order system is used to track referrals but not all departments use this system, consequently staff are unable to track responses. Staff said that they cover for each other over lunch hours and breaks, but when someone is out on leave they have no back up. In the past, the Manager filled that role.

Some of the frustration voiced by the Customer service staff was their inability to reach people by phone or emails to obtain help for the caller. The phones are not consistently answered, some key phone inboxes are full and callers cannot leave a message, departments do not always respond in a timely manner to emails, and the like. If customer service is a priority, establishing agreed to protocols for escalating calls, and tracking and monitoring calls for service or complaints has to be a priority.

Communication and a consistent message can only happen when the efforts are well-coordinated, and staff have the tools and other resources to support the function.
RECOMMENDATION

Recommendation 2-5:

Create a Communications Office that oversees Customer Service and manages the City website.

The Customer Service Manager position should be filled with another call-taker position, and one of the current call-takers elevated to a Lead position reporting directly to the Communications Director. A Webmaster position should be created to not only administer the technical side of the website, but also assist the Communications Director in designing and controlling content to ensure a consistent message is being sent across all departments.

Exhibit 2-9 shows the proposed organizational chart.

Exhibit 2-9
Communication Director Organizational Chart

Once the structure is in place, management should work with the department heads to establish lines of communication regarding the handling of customer calls for assistance and complaints, as well as their goals for how a consistent message of customer service can be implemented.

FISCAL IMPACT

The following chart shows the costs and savings associated with the proposed changes. Salaries are based on approximate amounts paid for similar positions with the City.

<table>
<thead>
<tr>
<th>Position</th>
<th>Salary</th>
<th>Benefits (69.89%)</th>
<th>Savings (Costs)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customer Service Manager</td>
<td>$103,000</td>
<td>$70,956.70</td>
<td>$173,957</td>
</tr>
<tr>
<td>New Customer Service Representative</td>
<td>($65,000)</td>
<td>($44,778.50)</td>
<td>($109,779)</td>
</tr>
<tr>
<td>Webmaster</td>
<td>($76,000)</td>
<td>($52,356.40)</td>
<td>($128,356)</td>
</tr>
<tr>
<td><strong>Total Savings (Costs)</strong></td>
<td>($38,000)</td>
<td>($26,178)</td>
<td>($64,178)</td>
</tr>
</tbody>
</table>
### Recommendation:

<table>
<thead>
<tr>
<th></th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Create a Communications Office</td>
<td>($64,178)</td>
<td>($64,178)</td>
<td>($64,178)</td>
<td>($64,178)</td>
<td>($64,178)</td>
</tr>
</tbody>
</table>

### 2.3 **LEGAL SERVICES**

According to the City Charter, “on the second Tuesday following his (or her) election, the Mayor shall appoint a Corporation Counsel for the term of two years or until his successor is appointed and qualified, unless removed for cause.” The current Corporate Counsel is a part-time employee of the City and receives benefits, but also practices law, and he and his firm represent other cities in the area.

The Deputy Corporate Counsel is a full-time employee of the City and is appointed by the Mayor. This position is responsible for managing the day-to-day operations of the Legal Department and the incumbent has been in his position for more than 20 years.

**Exhibit 2-10** provides the organization structure of the Legal Department.

![Exhibit 2-10](image)

*Source: Compiled by Evergreen, December 2021.*

In addition to the four full-time attorneys and the support staff who report to the Deputy, the Department contracts for legal services with specialized legal expertise as needed.

**Exhibit 2-11** provides a comparison of the Norwalk Corporate Counsel’s budgets and staffing to a select group of peer cities. As shown, the City’s staffing and budgeted expenditure levels are comparable to its peers.
**Exhibit 2-11**  
**FY 2022 Budgeted Legal Expenditures and Staffing Levels**

<table>
<thead>
<tr>
<th>City</th>
<th>Legal Budget</th>
<th>FTE Legal Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk, CT</td>
<td>$1,415,277</td>
<td>9.0</td>
</tr>
<tr>
<td>Newton, MA</td>
<td>$2,025,208</td>
<td>14.0</td>
</tr>
<tr>
<td>Lynchburg, VA</td>
<td>$814,164</td>
<td>7.9</td>
</tr>
<tr>
<td>Nashua, NH</td>
<td>$812,718</td>
<td>6.0</td>
</tr>
<tr>
<td>Cranston, RI</td>
<td>$648,148</td>
<td>1.0</td>
</tr>
<tr>
<td>Longmont, CO</td>
<td>$1,541,825</td>
<td>9.0</td>
</tr>
<tr>
<td>Framingham, MA</td>
<td>$411,287</td>
<td>9.0</td>
</tr>
<tr>
<td>Santa Barbara, CA</td>
<td>$4,063,086</td>
<td>16.8</td>
</tr>
<tr>
<td>Stamford, CT</td>
<td>$2,921,059</td>
<td>4.0</td>
</tr>
<tr>
<td>New Haven, CT</td>
<td>$2,816,999</td>
<td>21.0</td>
</tr>
<tr>
<td>Waterbury, CT</td>
<td>$2,096,797</td>
<td>17.0</td>
</tr>
<tr>
<td>Danbury, CT</td>
<td>$1,037,000</td>
<td>3.0</td>
</tr>
<tr>
<td><strong>Average w/o Norwalk</strong></td>
<td><strong>$1,765,299</strong></td>
<td><strong>9.9</strong></td>
</tr>
</tbody>
</table>

Source: Compiled by Evergreen from FY 2022 Adopted Operating Budgets.

Charter §63-2 duties contain the following:

_Said Law Department shall be the sole legal representative of the municipal corporation, and shall perform the following duties:_

**A.** Represent and advise the Mayor, Common Council, and all city officers, agencies, boards and commissions in all matters of law pertaining to their respective offices and/or duties.

**B.** Upon request of the Common Council or any committee or any member thereof assist in the preparation of any ordinance or other legislation affecting the city. The Corporation Counsel may require that such requests be in writing.

**C.** Represent and appear as and be the attorney of record in all actions and proceedings for the enforcement of ordinances, other regulations and claims of the city and in all actions or proceedings in any court or before any board wherein the city or its officers, officials, boards, agencies or commissions or employees, by reason of any suits growing out of their official duties, shall be parties defendant or parties in interest.

**D.** Supervise the preparation of all ordinances, regulations, resolutions, contracts and any other legal papers of whatever nature.

**E.** Shall render formal opinions and give necessary legal counsel and advice when required by the Common Council or any member thereof, the Mayor or any board, agency, commission or department. The Corporation Counsel may require that such requests be in writing.
FINDING

The current Corporate Counsel is attempting to organize the City’s Legal Department to operate more like a legal firm with on-line records keeping and research capabilities and collaboration with other municipal attorneys.

For example, rather than continually updating hard copy legal reference material, the Department now subscribes to Westlaw at a cost of about $29,000 per year. The subscriptions provide the Office access to the most current and searchable statutes, case law, and other legal reference materials which speeds up and simplifies the research process.

Paper files and the retrieval of documents are now being reduced or eliminated through the use of Worldox—an online system that catalogs and stores documentation. The system allows members of the legal team to store documentation, notes, emails and the like, and to quickly find all the documents, including emails, on a case or matter so they can collaborate more effectively.

In addition, the City is a member of CAMA (Connecticut Association of Municipal Attorneys), and the legal staff uses them to ask the group questions and get information as issues arise. This was important during the height of COVID as the City struggled to navigate the legal maze. The Corporate Counsel was able to ask the group how they planned to address a situation and received feedback from his counterparts on what they were doing or had tired successfully and unsuccessfully.

COMMENDATION

The Corporate Counsel has made improvements in the Legal Department designed to help the office run more effectively and efficiently.

FINDING

The Legal Department, in collaboration with the third-party liability insurance provider, has developed a successful method of investigating, handling and defending liability claims.

The City is self-insured for the first $1 million in workers’ compensation, general, auto and property liability coverage, and purchases third-party liability coverage for up to $112 million through the Connecticut Interlocal Risk Management Agency (CIRMA).

Liability claims go to the City Clerk and the Clerk sends the claims to CIRMA, with copies to the Legal Department and the departments involved. CIRMA investigates each claim and makes a recommendation to the Legal Department for action. The Legal Department monitors the investigation and works with investigators throughout the process. If during the course of the investigation, CIRMA estimates that the claim will exceed $1 million, they alert the Legal Department to the issues. All of the costs for processing and investigating the claims are charged back against the City’s Internal Service Fund to meet the deductible.

Attorneys have the authority to settle claims up to $5,000; higher amounts must go to the Common Council for approval.
According to the notes to the Audited Financial Statements, under this program the City is obligated for claims payments up to the $1 million deductible. Settled claims have not exceeded commercial coverage nor has coverage been materially reduced in any of the last few years. The City makes payments to the Internal Service Fund based on estimates of the amounts needed to provide for normal occurrence of claims.

**COMMENDATION**

The cost of liability claims against the City are contained through a collaborative effort between the Legal Department and the City’s third-party insurance provider.

2.4 **OFFICE OF THE TOWN CLERK**

Connecticut General Statutes Chapter 92 identifies the requirements of the Town Clerk. The City’s website states the mission of the Town Clerk is to:

- accurately record, report and maintain land records, vital statistics, and dog and game licenses according to state statutes, federal regulations, municipal charter, and local ordinance;
- collect and maintain records on local and state real estate conveyance tax, recording fees, and other legally prescribed revenue sources; and
- administer the election laws, including the processing of absentee applications and ballots, as required by state statute.

Exhibit 2-12 provides the organization of the Office of the Town Clerk.

Exhibit 2-12

Town Clerk Organization Structure for the City of Norwalk

Source:  Compiled by Evergreen, January 2022.
As noted in the City Charter, the Town Clerk is an elected office and the position holds office for a two-year term. The current Town Clerk was re-elected to this position in November 2021, and has been in office since 2011.

All staff assist customers coming into the Office. The Deputy Town Clerk is the second position in charge of the Office. Both the Deputy and the Assistant Town Clerk are certified by the Connecticut Town Clerks Association which, in addition to the Town Clerk, allow them to sign all official documents. The Assistant manages the elections, and delivers the funds collected in the Office to the Comptroller’s Office. The Land Records Analyst manages the indexing of the property records. The administrative staff support all the functions in the Office.

**Exhibit 2-13** identifies the amount collected by type of fee for FY 21. The fees collected to record documents (such as marriage, birth and death records) are the highest amount collected from citizens.

<table>
<thead>
<tr>
<th>Type of Fee Collected</th>
<th>Amount Collected</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recording Fees</td>
<td>$428,034</td>
</tr>
<tr>
<td>Vitals Copies</td>
<td>$206,905</td>
</tr>
<tr>
<td>Town Clerk Fund</td>
<td>$29,910</td>
</tr>
<tr>
<td>Dog Licenses</td>
<td>$24,240</td>
</tr>
<tr>
<td>Marriage License</td>
<td>$21,600</td>
</tr>
<tr>
<td>Notary</td>
<td>$9,234</td>
</tr>
<tr>
<td>Copies/Coin Copier/Scanner/Clerk Fee</td>
<td>$6,754</td>
</tr>
<tr>
<td>Death – Cremation Permit</td>
<td>$4,355</td>
</tr>
<tr>
<td>Copies to Other Towns</td>
<td>$2,402</td>
</tr>
<tr>
<td>Liquor Permit</td>
<td>$1,420</td>
</tr>
</tbody>
</table>

Note: Excludes state fees disbursed by the Town Clerk.

**FINDING**

The Town Clerk installed a drop box outside the City Hall and has expanded its online services. Prior to the pandemic, all patrons came inside the building for services such as requesting copies of birth and death records and to deliver land recordings and other types of records. The Town Clerk added the drop box during the pandemic to provide an option for patrons to drop their requests outside the building. It is a convenient way to request services 24/7 where an immediate response is not necessary.

The Town Clerk has also added marriage and dog license applications to its website to encourage patrons to complete the forms prior to coming into the office. Applicants for dog licenses can now mail or email the requests. The website also allows patrons to print records from their own copier at home, and the office collects revenue for those web prints.
COMMENDATION

The Town Clerk installed a drop box outside the City Hall and has expanded its online services.

FINDING

Internal controls of the cash collection process in the Town Clerk’s Office are not effective. The Office receives up to $600 in cash per day and the funds are held in the cash drawers for use during the day. They also receive payments by check and credit cards. At the end of each day, the Assistant Town Clerk records the type of funds collected, completes a separate cash receipts transmittal form for each type of fund, and delivers the funds and forms to the Comptroller’s Office.

In 2013, the City initiated a forensic accounting investigation of what was identified as a “Town Clerk Office matter.” The investigation determined that the Office lost nearly $75,000 resulting from poor internal controls of its cash. Exhibit 2-14 includes some key highlights from the investigation report’s identified concerns.

<table>
<thead>
<tr>
<th>Investigation Topic</th>
<th>Poor Internal Control Examples</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clerk Fees</td>
<td>The Town Clerk does not provide refunds to patrons who present payment checks that exceed the amount due. The NewVision system posts the difference of the payment due and the payment received to a Clerk Fee account. There are limited controls over this process.</td>
</tr>
<tr>
<td>Petty Cash</td>
<td>The Clerk Fee transactions are removed from the daily report and placed into a Petty Cash envelope. The funds are delivered to the Comptroller’s Office when the envelope became too large, but not at a defined amount.</td>
</tr>
<tr>
<td>Void Receipts</td>
<td>The NewVision system allows receipts to be voided without a second approval.</td>
</tr>
<tr>
<td>Copier Fees</td>
<td>One staff removes the coins from the copiers, but a second staff is not present. The copier fee line item on the daily cash report can be changed.</td>
</tr>
<tr>
<td>Manual Reconciliation</td>
<td>Invoicing for agent account activity is manual and outside of NewVision. The balance is not reconciled by Town Clerk or Comptroller staff.</td>
</tr>
<tr>
<td>Change Transaction Type</td>
<td>Transactions originally posted as cash can be changed to an agent account without a second approval. The result is that cash can be diverted from the day’s funds to be deposited. Agent accounts are invoiced for collection later.</td>
</tr>
</tbody>
</table>


The Town Clerk stated that little has changed since the completion of the investigation, and that the Comptroller’s Office has not provided support for changes needed in how the Office manages cash. At the time of this review, the Comptroller’s Office did not have a copy of the investigation report.

Without ensuring appropriate internal controls are in place, the City is at risk with its cash.
RECOMMENDATION

Recommendation 2-6:

Develop tighter controls over cash in the Office of the Town Clerk.

To improve internal controls, the Town Clerk’s Office should review the voided transaction reports on a periodic basis to address any anomalies immediately. They should reconcile the NewVision reports of collections to MUNIS at least annually with assistance from the Comptroller. The Office should verify any petty cash accounts at least annually. They should also perform surprise spot checks of customer transactions, especially those with cash. Additionally, the Office should require that any changes such as voided receipts, daily cash report line items, and transaction types should require a second approval.

The Town Clerk should coordinate with the Comptroller’s Office to review and determine additional improvements that should be made in the Office.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The Town Clerk’s Office lacks documented operational procedures. The staff report that they are aware of what to do in the Office based on their experience. Some of the staff have been employed with the Town Clerk’s office for many years. The Office does not require each position to have its procedures recorded.

Some staff have developed their own individual position procedures kept at their desk. Some staff keep handwritten notes, memos, and emails when procedures shift. Less experienced staff learn on the job, and supervisors said that when they have an inexperienced staff, they verbally review the job’s expectations with the staff.

The Office of the Town Clerk has critical legal functions in the maintenance of records. The Connecticut State Library cites the required municipal retention and disposition schedule for Town Clerks and Registrars of Vital Statistics Records.

Exhibit 2-15 provides examples of the types of records required by Town Clerks to maintain.
Exhibit 2-15
Examples of Records Required by Town Clerks to Maintain
FY 21

<table>
<thead>
<tr>
<th>Item Number</th>
<th>Record Series Title</th>
<th>Minimum Retention Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>M1-065</td>
<td>Construction contracts</td>
<td>6 years after completion of project</td>
</tr>
<tr>
<td>M1-070</td>
<td>Services and Supplies contracts</td>
<td>3 years after expiration</td>
</tr>
<tr>
<td>M5-060</td>
<td>Dog licenses</td>
<td>1 year</td>
</tr>
<tr>
<td>M5-160</td>
<td>Liquor permits</td>
<td>1 year</td>
</tr>
<tr>
<td>M5-245</td>
<td>Town Attorney opinions</td>
<td>Permanent</td>
</tr>
<tr>
<td>M5-325</td>
<td>Deeds or Easements</td>
<td>Permanent</td>
</tr>
<tr>
<td>M5-342</td>
<td>Subdivision Maps</td>
<td>Permanent</td>
</tr>
<tr>
<td>M5-345</td>
<td>Land Records and Indexes</td>
<td>Permanent</td>
</tr>
<tr>
<td>M5-370</td>
<td>Birth Certificate (original/certified copy/belated)</td>
<td>Permanent</td>
</tr>
<tr>
<td>M5-420</td>
<td>Vital Record: Written Request for Birth</td>
<td>2 years</td>
</tr>
<tr>
<td>M5-425</td>
<td>Vital Record: Written Request for Death</td>
<td>No requirement</td>
</tr>
<tr>
<td>M5-430</td>
<td>Vital Record: Written Request for Marriage</td>
<td>No requirement</td>
</tr>
<tr>
<td>M5-480</td>
<td>Marriage Certificate (original or certified copy)</td>
<td>Permanent</td>
</tr>
<tr>
<td>M5-540</td>
<td>Death Certificate (original/certified copy/fetal)</td>
<td>Permanent</td>
</tr>
</tbody>
</table>


There are significant differences for how to process each type of record. For example, there are multiple steps to recording, reporting, and maintaining land records. With only one land records analyst, there is a risk to the City that if this experienced analyst left employment; the other staff are not experienced in conducting the duties of this position.

Recording, reporting, and maintaining vital statistics, including birth and death records, are critical City services. Administering the election laws is also critical. The risk of not timely and accurately managing these records and services could impact citizens.

Some staff have information from the Connecticut Town Clerks Association for the laws and rules in the State that all Town Clerk offices follow. However, these do not serve as Office operational procedures.

Without documented procedures, the Office is at an increased risk when experienced staff depart. Risk also exists given that the Town Clerk is an elected position. There is a risk that the Office will become inefficient as staff will be unaware of many of the duties the vacating staff have been performing.

Effective organizations document their procedures and practices to ensure continuity and avoid disruption of the office. SHRM’s organizational toolkit cites that there are many ways to communicate procedures, but handbooks are still the best way to deliver a consistent message to all employees with respect to standard operating procedures.

RECOMMENDATION

Recommendation 2-7:

Develop operational procedures for the Office of the Town Clerk.
The Town Clerk should require each employee to record his/her daily tasks and activities. Once compiled, the Office should consolidate the information into a procedure manual and distribute to all staff. The Department should annually review the procedures to revise and update as needed.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING**

The Town Clerk does not regularly participate with other City department leaders in meetings with the Mayor. Even though this position is an elected position, the Office of the Town Clerk is often viewed as an independent unit—separate from the general management structure of the City.

The Office of the Town Clerk is where residents ask questions on a variety of topics as it is the first open door in City Hall. As a result, the Office is asked about many topics, but have access to only the information that is released to the public through City press releases. Communications does not provide an internal newsletter to City Hall staff on the activities of other City divisions. However, the Office regularly interacts with other departments. For example, they support the Tax Collector with recording tax liens. With Planning and Zoning, the Office provides maps and information about the property owners. For Building and Code Enforcement, the Office supports the Blight program to verify the owner of the residence. The Office coordinates with Recreation and Parks to verify birth certificates for student program participation.

The Town Clerk indicates that he often serves on behalf of the Mayor at City and community engagements when the Mayor has a conflict and cannot attend. Without the Town Clerk receiving ongoing information about activities of the divisions in the City, the Town Clerk is not fully informed to be able to answer questions from residents.

In the past, meetings with the Mayor and other City department leaders were held monthly, but the meetings where the Town Clerk was included have been discontinued. Without regular information on the ongoing activities of other departments, the Office of the Town Clerk is limited with its information. SHRM states that linking organizational communication to business strategy is essential to effective and consistent business operations. Effective communication contributes to organizational success.

**RECOMMENDATION**

**Recommendation 2-8:**

Include the Town Clerk as part of the City Leadership Team to ensure all departments are effectively communicating.

The Mayor should add the Town Clerk into a bi-weekly communication to ensure all departments are effectively communicating.
FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

Customers are not typically aware of the roles and differences between the City Clerk and the Town Clerk.

Other than a summary on the City’s website, information about the services of the Town Clerk is not communicated and available. Staff report that daily there are questions and requests from customers for services that are not managed by the Town Clerk’s Office. The result is that without more robust information, the limited number of staff in the Office often spend time to communicate about other City services.

Effective organizations ensure adequate information is available to share with residents.

RECOMMENDATION

Recommendation 2-9:

Expand the information available on the City website to stakeholders about the Office of the Town Clerk and the role of the City Clerk.

The Town Clerk and City Clerk should review the information that is available on the website and identify opportunities to expand the information available to stakeholders about their services.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The configuration of the Town Clerk’s office space is not secure. There is one main customer counter at the center with plexiglass and another customer counter to the side with partial plexiglass. Customers arrive to an entry area without a defined space for where to be assisted. The order of which customer to serve first is not delineated in the available space. The Office handles cash and the area where customers provide cash is accessible because there is not a solid wall, increasing the risk to staff. Its configuration is not consistent with other City offices who receive cash such as the Tax Collector.

Signage hangs from the ceiling to indicate the types of services available, but staff reported that service for any type of request can be managed at any of the counter areas. Staff work in an open area visible to customers. Staff reported that some discussion has occurred regarding the office configuration of the office, but no changes have been made.
Ensuring a safe and secure location can reduce the risk to staff and improve the customer experience while requesting services from the Office.

RECOMMENDATION

Recommendation 2-10:

Evaluate the Town Clerk’s Office layout to develop a more secure space, increase the safety of staff, and improve the customer traffic flow.

The Town Clerk should coordinate with the City’s Building Director who manages the City Hall offices to conduct an assessment. The assessment should include a review of the Tax Collector’s Office to evaluate if a similar layout could work in that Office.

Upon completion of the assessment, the Town Clerk should coordinate with the Comptroller to develop a cost estimate. The Town Clerk should include the cost estimate in the next budget cycle.

FISCAL IMPACT

The fiscal impact cannot be determined at this time. The amount and type of renovations will determine the cost. Once the assessment is complete, the amount can be estimated.

2.5 OFFICE OF THE CITY CLERK

The City Clerk position is authorized by the Charter and appointed by the Mayor for a two-year term. Organizationally, the City Clerk reports to the Chief of Staff, and the Assistant City Clerk and an administrative support position report to the City Clerk.

The City Clerk has the following duties outlined in City Charter:

- The Clerk of said city shall also be Clerk of the Council and shall keep records of all the votes and proceedings of said city, and of said Council.

- He shall cause the ordinances of said city to be published according to law, and, when so published, shall enter upon the records his certificate thereof.

- He shall cause to be served by the City Sheriff or other proper officer all notices or orders of the Council and shall enter upon the records the return of such service.

- He shall issue over his signature such licenses and permits as may be granted by said Council or prescribed by the charter and ordinances of said city, and shall make a record thereof in a book kept for that purpose; he shall collect the money due for such licenses or permits and pay the same to the Treasurer of said city every 30 days; and he shall collect all such bills as the Council may order, and account for the same to said Treasurer.
• He shall perform all such duties as may be required of him by this act or by any vote or ordinance of said Council and shall also record all amendments to this Charter and all ordinances passed by the Council in a book kept for that purpose.

• He shall keep his office open at such hours as the Council shall direct.

• He shall be Clerk of the Board of Estimate and Taxation and shall keep true records of all the votes and proceedings of said Board, which records shall be at all times open to public inspection and preserved in the records of the city.

• He shall be the Clerk of the Board of Assessors and of the Board of Relief.

• All records of such Clerk shall have the same validity as records of Town Clerks and shall be in all courts evidence of the truth of the matters therein contained, and a duly certified copy of any such records shall be received in all courts as evidence of the same validity as the original record.

FINDING

In April 2021, the City Clerk launched an eproval website to accept, and issue permits for food vending, films and special gathering and events—making the permitting process almost entirely automated.

The City Clerk’s website contains a link to the portal and depending on the selection, the applicant is provided information regarding the rules for obtaining the permit. Under the Public Gathering/ Special Events section the use is provided links to the following:

Public Gathering / Special Event

• Application for License of Public Gathering or Special Event
• Public Gathering and Special Events Calendar
• Street Vendor License Application

The Special Events calendar shows the dates and times that other events are scheduled to make it possible for the applicant to pick a date based on other scheduled activities already planned.

Following the guidelines, the user is asked to set up an account and sign into the system. Here they complete the application. The City Clerk process the request, alerting the various departments that may be impacted by a special event, and approves or denies the permit accordingly.

Permit fees are now paid on-line in most cases, with only a very few exceptions. The City Clerk worked with the vendor during the initial roll-out and made modifications to ensure that the system worked as intended. During the process, the vendor was able to automate the electronic issuance of the permit once approved and the fees were paid. According to staff, the portal has significantly reduced the amount of time that they spend on the permits as the process is almost entirely automated.
COMMENDATION

The *e*proval on-line permitting system has significantly improved the permitting, payment and permit issuing processes for the City Clerk.

FINDING

Although the City Clerk is the Records Administrator for the City, the Department is only tracking Freedom of Information Act (FOIA) requests that come through the City website; whereas requests sent directly to the departments are not tracked nor monitored to ensure compliance with the Act. The Police Department handles their own FOIA requests, which involve law enforcement records that have separate guidelines and requirements. They track the requests and work directly with the Legal Department when an opinion is needed.

Timelines for responding to FOIA requests are set in statute: “any denial of the right to inspect or copy records provided for under section 1-210 shall be made to the person requesting such right by the public agency official who has custody or control of the public record, *in writing*, *within four business days of such request*, except when the request is determined to be subject to subsections (b) and (c) of section 1-214, *in which case denial shall be made in writing within ten business days of such request*. Failure to comply with a request to so inspect or copy such public record within the applicable number of business days shall be deemed to be a denial.” Conn. Gen. Stat. §1-206(a). Although there are exceptions in law, failure to comply with the timelines can result in appeals, litigation and penalties.

The City Clerk’s website has a link to a Freedom of Information form that can be used by the requester. Once entered, an automatic response is sent to the requester acknowledging the request. The City Clerk tracks those requests and either provides the copies or sends the requests to the appropriate department. The departments are responsible for filling the request but at this time, no follow up is done with the departments to ensure their timely compliance with the request.

The City has no specific information or training for department staff who receive information requests directly, and consequently there is no oversight to ensure that each department is complying with the law. Corporate Counsel said they occasionally are asked to make a ruling on specific types of information that can be released or must be redacted, but the requests for a legal ruling come primarily from the Police Department.

RECOMMENDATION

Recommendation 2-11:

Centralize the processing and tracking for Freedom of Information Act requests to ensure that the requests are recorded and responded to in compliance with the Act.

A brief explanation of the appropriate handling procedures should be prepared and distributed to all department heads, and where possible, the requesters should be encouraged to use the City
Clerk website to ensure that requests are appropriately tracked. Corporate Counsel should become involved in the drafting of the guidelines.

The tracking, monitoring and follow-up process for Freedom of Information Act requests is clerically labor intensive and should be carried out by an individual with a thorough understanding of the workings of the City and the ability to discern when legal expertise is needed. Assuming a Communications Office is established as recommended in **Recommendation 2-5**, hiring an individual to perform the associated tracking, monitoring and follow-up functions. This would place the position in the Mayor’s Office with direct access to Corporate Counsel and the Mayor’s Chief of Staff, when questions or concerns arise.

**FISCAL IMPACT**

The position should be brought in at approximately the same level as a Customer Service Representative at $65,000 annually plus benefits of $44,779 for a total annual cost of $109,779.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Centralize the Processing and Tracking for Freedom of Information Act Requests</td>
<td>($109,779)</td>
<td>($109,779)</td>
<td>($109,779)</td>
<td>($109,779)</td>
<td>($109,779)</td>
</tr>
</tbody>
</table>

**FINDING**

Some of the Freedom of Information requests require extensive research and may go back to the early 1900s. At this time, the City Clerk is not charging requestors for staff research time, but estimated that considerable time is spent during the course of a week on research.

The website has no explanation of the FOIA requirements or the right of the City to charge a fee for research and printing. The City Clerk knew the FOIA requirements and deadlines but indicated that no formal training had been given to department heads and fee schedules for copies of documents or the research time spent to fill the requests were not standardized.

Connecticut General Statutes Sec. 1-212. (Formerly Sec. 1-15). Copies and scanning of public records. Fees, outlines what fees can be charged for information requests.

The Town of Easton, CT had a three-page document on its website. The first page contained the guidelines and time frames for a response and a brief explanation about records retention periods that may impact the availability of some information. The second page, as shown in **Exhibit 2-16**, contains their Summary of Charges.

This document appears to follow the statutory guidelines mentioned above and could provide a template for the City of Norwalk to use when publishing their charges.
### Exhibit 2-16
Town of Easton
Summary of Charges


<table>
<thead>
<tr>
<th>Summary of Charges:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>A. To review existing records (No scanning, copying, imaging)</td>
<td>No Charge</td>
</tr>
<tr>
<td>B. To discuss existing records</td>
<td>No Charge</td>
</tr>
<tr>
<td>C. A copy of an existing record, non-certified pages [CGS 1-212(2)]. Two sided documents are two pages.</td>
<td>$ .50 *</td>
</tr>
<tr>
<td>D. Use of a any “hand-held scanner” (or similar hand held device) by the public to make copies/images of documents</td>
<td>$20.00/day</td>
</tr>
<tr>
<td>E. To certify a document [CGS 1-212(6) or any fact appearing therefrom]</td>
<td>1st page: $1.00 and each add 1 page: $ .50</td>
</tr>
<tr>
<td>F. Maps, surveys, or records [CGS§1-212(b)(2)(3)]</td>
<td>Varies by size and b/w vs color</td>
</tr>
<tr>
<td>• A copy of plans or a Mylar® not recorded per-sheet [CGS§1-12(2)]</td>
<td>Actual Vendor Cost</td>
</tr>
<tr>
<td>• A copy of a recorded Mylar per sheet</td>
<td></td>
</tr>
<tr>
<td>• A photo copy or reproducible copy of a document by an outside vendor</td>
<td></td>
</tr>
<tr>
<td>G. A record or report from a standard available computer run – per page (existing report option) (NOTE: does not include special programming, reformatting or custom reports)</td>
<td>$ .50</td>
</tr>
<tr>
<td>H. Computer formatting and/or programming to produce a specialized or custom report [CGS§1-212(b)(1)]</td>
<td>Actual salary-rate/hour of Town staff (plus $ .50 per page, or actual cost of outside vendor and/or materials to fulfill request)</td>
</tr>
<tr>
<td>I. Computerized information stored with our outside vendors which we Town have to pay for, if obtained, to honor the request</td>
<td>Actual vendor cost and materials to fulfill request</td>
</tr>
<tr>
<td>J. Copies of Town data available on separate electronic media [CGS§1-212(b)(3)]</td>
<td>Actual Cost of Electronic Media</td>
</tr>
<tr>
<td>K. Board and Commission Members requesting copies of documents specifically relevant to the current activities of the Board or Commission for the purpose of working in conjunction on the same issue</td>
<td>No Charge</td>
</tr>
<tr>
<td>L. Public request for hard copies of Board, Commission and Committee agendas, minutes and notices by standard USPS surface mail</td>
<td>Actual postage cost to mail and $ .50 per page</td>
</tr>
<tr>
<td>M. E-mails of agenda, minutes and notices created for Town business that are already archived in electronic form, if available per Connecticut State Library Records Disposition Guidelines</td>
<td>No Charge – You must retrieve from Town website</td>
</tr>
</tbody>
</table>

### RECOMMENDATION

**Recommendation 2-12:**

Develop a consistent plan for charging for the Freedom of Information Act services provided, including staff research time and copying expenses.

Corporate Counsel should assist in the review and establishment of appropriate fee schedules for the City Clerk and the departments that handle a high volume of requests for department-specific documents.
FISCAL IMPACT

Assuming staff spend a minimum of only five (5) hours per week performing research related to FOIA requests, and the hourly rate of an administrative support position is $35, over a period of a year, the charges for those services would be $8,750 (5 hours X 50 work weeks X 35 per hour). Consistently charging for copies at a reasonable rate could result in additional revenues of at least $10,000 per year.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Consistently Charge for FOIA Services</td>
<td>$10,000</td>
<td>$10,000</td>
<td>$10,000</td>
<td>$10,000</td>
<td>$10,000</td>
</tr>
</tbody>
</table>

FINDING

The City Clerk is responsible for Records Retention for the City. The storage, retrieval and disposal of the paper documents stored in the archives is a manual, time-consuming process.

The Connecticut State Library establishes General Records Retention Schedules for the Municipal Records Management Program which includes municipalities, towns, cities, boroughs, political subdivisions, and certain quasi-public agencies.

There are 17 different General Retention Schedules for Municipalities:

- M1 - General Administration Records
- M2 - Personnel/Labor Relations Records
- M3 - Fiscal Records
- M4 - Taxation - Assessment/Collection Records
- M5 - Town Clerks and Registrars of Vital Statistics Records
- M6 - Electors and Elections Records
- M7 - Public Safety and Emergency Services Records
- M8 - Education Records
- M9 - Public Works
- M10 - Land Use and Development
- M11 - Library, Museum, Special Collection, and Archival Records
- M12 - Health Departments/Districts/Clinics Records
- M13 - Human Services/Social Services/General Assistance Records
- M14 - Parks and Recreation Records
- M15 - Locally Owned Utilities/Regional Authorities
- M15.1 - Connecticut Municipal Electric Energy Cooperative (CMEEC)
- M16 - Electronic Data Processing Records

Exhibit 2-17 provides an example from the M3 Fiscal Records.
Exhibit 2-17
Sample of Municipal Record Retention Schedule

All City archived documents are stored in the basement and the volume of paper in every area is mammoth. No plans are underway to attempt to digitize the files to make them searchable and retrievable electronically.

RECOMMENDATION

Recommendation 2-13:

Begin the process of digitizing archived records, and establish a plan for the project to be completed within the next five years.

The process is time consuming in that all files that are scanned must be verified and cataloged to protect the integrity of the information. Establishing a plan and budgeting a money and resources needed to complete the project over five years would make the project manageable. The most current documents should be digitized first, and all newer documents being added to the digitized as the documents are sent to the archives.

FISCAL IMPACT

While costs vary among vendors, allocating $100,000 per year should allow the project to be completed over a five-year period.

FINDING

The fees for the rental of the Concert Hall have not been reassessed in a number of years and may not recover the cost to the City for making the Hall available to the public.

While the City wants to encourage the use of the Concert Hall, the City may be incurring costs for the use of the Hall that are not being covered by the current rental rates. The charge for the use of the hall for non-profit organization is $1,000 per event and $1,750 per event for-profit organizations. Apparently, there is at least one organization that does not pay the full price for the use of the Hall as they are grandfathered at a lower rate.

According to City Clerk staff, the rental may include not only the day of the event, but also rehearsal days, days when the stage is set up and taken down, and the like. On these days before and after the event, the lights are on, security guards are in place and custodial services are needed.

Although the website contains information regarding the availability of the Hall, as shown in Exhibit 2-18, the process for rental is manual, and requires regular and constant intervention by City Clerk staff to meet the renters needs before, during and after the event.

Exhibit 2-18
Concert Hall Website

Considering the staff hours required to manage each rental, some consideration should be given to set the rates to include the cost of staff hours used to manage the rentals and assist the renters with event planning.

**RECOMMENDATION**

**Recommendation 2-14:**

Reassess the charges for the use of the Concert Hall to ensure that the City is reimbursed for the cost of providing this Hall to the public and ensure that pricing is standardized for all renters.

When estimating the total cost to the City for the use of the Hall, all direct and indirect costs should be considered, including but not limited to electricity; custodial services; security; City Clerk staff support before, during and after the event; as well as the cost of accounting and administrative indirect services.

**FISCAL IMPACT**

Based on the number of rentals per year and the fact that the rentals include multiple days for rehearsals and set up in addition to the actual event, setting a consistent rate that fully reimburses the City for the associated expenses, the City can expect additional revenues of $15,000 to $25,000 per year. To be conservative, the lower number is used.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Set Uniform Concert Hall Rental Rates to Reimburse City Expenses</td>
<td>$15,000</td>
<td>$15,000</td>
<td>$15,000</td>
<td>$15,000</td>
<td>$15,000</td>
</tr>
</tbody>
</table>

**2.6 STRATEGIC PLANNING**

The City has a number of comprehensive plans in place to guide certain City functions and services. The most comprehensive plans are the Citywide Plan of Conservation and Development (2019-2029) and the Norwalk Five-Year Consolidated Plan (Con Plan) which is mandated by federal law and regulations promulgated by the U.S. Department of Housing and Urban Development (HUD) for the City to receive federal funding for affordable housing and community development initiatives benefitting primarily low and moderate-income persons. This Con Plan consolidates into a single document the planning and application requirements for the Community Development Block Grant (CDBG) program.

Planning efforts are also completed or underway in the following areas:

- Neighborhood Planning
  - South Norwalk Transit-Oriented Development Plan (underway)
  - Manresa Island Plan
  - East Norwalk Transit-Oriented Development Plan
• Wall/ West Avenue Plan

Sustainability & Environment

• Following the 10-year citywide plan, Norwalk is founding a committee led by the Recreation & Parks Commission to create a Parks, Open Space, Trails, and Recreation System plan

Transportation, Mobility and Parking

• Transportation Master Plan (underway)
• 2020 Parking Plan


FINDING

The City of Norwalk does not have a comprehensive strategic plan and the many plans that are currently in place address a segment of the City’s overall services and operations rather than the City as a whole. The Citywide Plan of Conservation and Development (2019-2029) contains many of the elements of a strategic plan, and it often referred to as the City’s Strategic Plan. This plan is a great start; however, it is focused on a specific segment of the City’s operation and does consider all departments and functions of the City such as Fire, Police, Health Department, Libraries and the like.

Strategic planning is a proactive process of identifying the critical issues that an entity must address to efficiently continue providing value. Within municipal governments, a good strategic plan serves as a map for the Common Council, Mayor, senior leadership and staff to guide and direct business actions towards meeting the City’s goals. In addition, such a plan moves the City from a reactionary mode to a proactive operating mode by connecting goals, strategies, performance measures, and action plans to the budget. Municipalities that link these elements through the planning process realize high success rates in achieving identified goals.

A strong Strategic Plan for the City will address four general questions:

• Where is the City as a whole, and the multiple service areas now?
• Where does the City want to be in ten years or longer?
• How is the City going to get there?
• How will the City measure progress and success?

The plans shown above, as well as other plans found within the various departments delve into the question of where the service areas within the City are today. The work done in creating these plans will lay the groundwork for an assessment of the City’s position as whole and the question of where the City wants to be in the future. The City is changing as evidenced by new construction, new business opportunities and a changing demographic. What are the current priorities of the residents and how will those priorities change as the City changes? And, what can, and should the City be doing to control, direct, address those changing needs?
Each of these plans has goals and objectives that speak to scope of the plan but none of them address improvements in operational areas such as City Finance or Human Resources. The Common Council and the Leadership Team should drive strategic goal setting rather than any one department, board, or commission, although their input and concerns are valuable and necessary in the process. Each strategic goal should be broad and encompass universal concepts that cross functional areas. For example, a universal goal that crosses functional areas may be to “Continually look for ways to improve operations and customer service through the use of technology.” From a board goal, each functional area, whether operational or involving the delivery of a specific service would be able to develop strategies that could advance that goal.

Exhibit 2-19 illustrates a strategic planning model developed and successfully used by Evergreen and a number of its clients over the years.

### Exhibit 2-19
**Overview of Strategic Planning Process**

<table>
<thead>
<tr>
<th>Area of Review</th>
<th>Component of the Plan</th>
<th>Specific Focus of the Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>Where are we now?</td>
<td>Internal/External Assessment of the System as a Whole</td>
<td>• Situation Inventory/Environmental Scan</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Customer Analysis</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Quality Assessment and Benchmarking</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Leads to Strategic Issues</td>
</tr>
<tr>
<td></td>
<td>Internal/External Assessment of the Status of System Members and the System Office</td>
<td>• Intersections between and among the Members and System Office in furthering the System’s Mission and Core Values</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Staff and Management Involvement</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Communication</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Leads to Strategic Issue</td>
</tr>
<tr>
<td>Where do we want to be?</td>
<td>Animate the Vision</td>
<td>• Understand the System’s uniqueness</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Translate the Mission, Vision and Core Values into observable events or circumstances</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Leads to a Compelling Image of the Desired Future</td>
</tr>
<tr>
<td></td>
<td>Strategic Plan Framework/ Goals and Objectives</td>
<td>• The Long and Short-term Desired Results</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Specific and Measurable Targets for Accomplishment</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Leads to Quality Initiative Goals and Objectives</td>
</tr>
<tr>
<td>How do we get there?</td>
<td>Action Plan</td>
<td>• Activities to Accomplish Goals and Objectives</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Detailed Action Plans</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Leads to Resource Allocation</td>
</tr>
<tr>
<td>How do we measure our progress?</td>
<td>Performance Measures</td>
<td>• Ensures Accountability and Continuous Improvement-linked Performance Targets</td>
</tr>
<tr>
<td></td>
<td>Monitoring and Tracking</td>
<td>• Methods to Measure Results</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Systems to Monitor Progress</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Compilation of Management Information</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Maintains Plan on Track Toward Goals</td>
</tr>
</tbody>
</table>

Source: Created by Evergreen Solutions, LLC.

Finally, a Strategic Plan adds value if budgets are directly linked to the plan and progress is monitored. In terms of budget linkage, if additional staff are requested, the justification should be linked to one or more of the City’s strategic goals. Each strategy must have an owner, a metric by which progress is monitored and established reporting intervals for assessing progress.
RECOMMENDATION

Recommendation 2-15:

Develop a comprehensive Strategic Plan and implement follow through by linking the budget to the Plan and continually monitoring progress.

FISCAL IMPACT

Cities often use a facilitator to help guide the strategic planning process at a one-time cost of $10,000 to $20,000.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop a Strategic Plan</td>
<td>($20,000)</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>

2.7  CHARTER, ORDINANCES, AND PROCEDURES

Norwalk became a City in 1913. Section 1.4 of the City Charter adopted at that time transferred the rights and liabilities of the Town of Norwalk to the City of Norwalk. Although many of the 1913 articles remain as originally written, a quick scan of the amendment dates revealed Charter amendments to various sections in 1915, 1921, 1929, 1931, 1933, 1937, 1939, 1941, 1949, 1955, 1959, 1969, 1972, 1976, 1978, 1984, 2000, and 2016. While this information is not intended to be inclusive, the dates are provided to show that through the years sections of the Charter have been amended but a comprehensive revision of the Charter has not been undertaken since its adoption in 1913.

Ordinances found in code are more fluid, with the Common Council having the authority to adopt, amend and repeal codes as needed. The Ordinance Committee of the Common Council is charged with reviewing and recommending changes, additions or repeal of code to the Common Council for final adoption.

FINDING

The City Charter is outdated and contains provisions that are no longer applicable to current City operations.

A review of the Charter found references to conditions and structures dating back to the time when the City was a Town, elected positions that have no current function, and position descriptions with duties that no longer apply.

For example, Article X in the charter establishes a Department of Social Services. Under the powers and duties section, the Director of Social Services shall administer the powers and duties delegated to the Department of Social Services by the Welfare Commissioner or Commissioner of Income Maintenance of the State of Connecticut. In 1993, the State of Connecticut established regional offices throughout the State to administer the program, consequently, this is no longer a local function.
Under the Powers and Duties of the Mayor the charter contains the following [emphasis added]:

He shall be the conservator of the peace of the city, and shall have authority with force and strong hand when necessary to suppress all tumults, riots, and unlawful assemblages, and to arrest without warrant and order to be held in the city prison for a period not exceeding 24 hours, upon information, any person who may be detected in revelling, quarreling, brawling, or otherwise behaving to the disturbance of the public peace of said city. He shall have the power to enter any house, building, place, or enclosure wherein he may have reasonable cause to suspect dissolute or disorderly persons to be assembled, or which he may suspect to be occupied by any assemblages for an unlawful purpose or occupied or used for the purpose of lewdness, prostitution, or gambling; to command all such persons found therein to disperse immediately and to commit to the city prison any person neglecting or refusing to obey such command.

While at first reading, this authority may appear amusing, in reality, the City does not operate a prison, some forms of gambling are now legal in Connecticut, and the Mayor’s ability to enter a home because he suspects an unlawful assemblage, may be constitutionally questionable.

There are also four elected positions or groups of positions that no longer function but continue to be elected and, in some instances, paid for their service. These positions include the Sheriff, Treasurer, Selectmen and Constables and the reference to these positions in the Charter are as follows:

- § 1-214 Sheriff; authority and duties. [1] The Sheriff of the city shall, within the limits of the city, have the same authority, both criminal and civil, and be subjected to the same liabilities and penalties as Constables of towns. Said Sheriff shall serve notices of the Council when directed by the Clerk, and shall collect such bills and assessments as the Council may order, and he shall receive for all services rendered the legal fees provided by the general statutes for Constables of towns.

- § 1-215 Salary of Selectmen of the Town of Norwalk. The salary of each of the Selectmen of the Town of Norwalk shall, from September 1, 1947, be $150 per annum.[1]

- § 1-216 Powers and duties of Selectmen.

The powers and duties of said Selectmen shall, on and after the first Monday of October, 1913, be limited to the powers vested in and duties imposed upon them by the constitution and laws of the state in relation to the admission of persons to the privileges of electors in said town and the erasure from the registry list of the names of those who have forfeited the privileges of electors.

- § 1-217 Powers and duties of City Clerk, Registrar of Voters and Constables.

The powers and duties of the City Clerk, Registrar of Voters, and Constables shall be those by law conferred and imposed upon such officers of towns.

- § 1-303 Powers of police. Said police shall have the powers of Constables of towns in the apprehension and arrest of criminals and the service of process within the limits of said city.
Efforts to revise the Charter in 2016 was met with opposition. While the original 2016 report from the Charter Revision Committee identified many of the technical issues listed above—four items were included in the referendum; only one of which passed.

- Question 1. Which would change the Mayoral term length to four years, FAILED  
- Question 2. The question about eliminating the positions listed above, FAILED  
- Question 3. Which would have given common council members a raise from $600 per year to $2,300 per year, FAILED  
- Question 4. Changing all references to common council members to be gender neutral, PASSED BY A SIGNIFICANT MARGIN.

One opponent to the Charter revisions in 2016 stated after the election that she did not feel that the revisions went far enough. Given the need for word changes and revisions throughout, and a need for a total reorganization of the materials presented, the comment may have validity.

RECOMMENDATION

Recommendation 2-16:

**Establish a Charter Revision Committee to completely revise the City Charter.**

Whatever changes are recommended by the Charter Revision Committee, the politically charged items should be presented in such a way that voters are able to vote for the clean-up and reorganization of the Charter, while still voicing their opinion on the merit of the recommended changes in term limits, salary changes and the like.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

There are only a limited number of standard operating or desk top procedures to protect the City’s institutional knowledge base and ensure that the Charter provisions and Ordinances are being carried out at the department level.

The City of Norwalk lost a wealth of institutional knowledge when the long-term employees left as a result of the early retirement incentive. Some departments said they are still recovering—having to recreate some of the processes and procedures that the former employees used to accomplish their assigned tasks.
The lack of desk top procedures, that document the various steps taken by an employee to accomplish a task coupled with a lack of cross-training in many departments, places the City at serious risk when employees leave unexpectedly or take extended leave. Several employees told the Evergreen Team that when they take vacation or a sick day, their work is left for them until they return. During an extended illness this may not be an option and having a trained back up and/or documented desk top procedures is of critical importance in maintaining the continuity of services in a department.

Another issue identified during the study was the fact that some Charter and Ordinance requirements are not being carried out in practice. Outdated information contained in the Charter may be a contributing factor, as discussed earlier in this report. The study found instances where employees were unaware of a provision. For example, an ordinance prescribing the method for disposing of assets is not being followed in practice because the employees were unaware of the requirement.

This topic recurs in the individual department chapters relating to specific operational functions, but is brought forward here to emphasize the need for better documentation.

The typical hierarchy in terms of laws, policy and procedure is as follows with a lower level not having the authority to supersede the requirements of the higher levels:

- Federal Law
- State Law (May expand on federal law and address issues not otherwise addressed in federal law, but may not supersede federal law)
- Local Charter (Establishes the unique organization and structure of the City within all applicable federal and state laws)
- Local Ordinances (Establish the rules of conduct at the local level but cannot supersede the charter or federal and state laws)
- Local Policies (Elaborate on, interpret, or clarify the requirements of law, charter and ordinances)
- Operational Procedures (document how Local Charter, Ordinances and Policy will be put into practice by staff at the departmental level)

The City Charter and Ordinances follow the hierarchy; however, there is some breakdown in terms of policy and operational procedures.

**RECOMMENDATION**

**Recommendation 2-17:**

*Develop standard operating procedures in each department beginning with key functions performed by employees nearing retirement.*
Department heads should be instructed on developing operating procedures and be held accountable for ensuring that key staff are working to develop this level of documentation. The operating procedures should be used for cross-training purposes.

**FISCAL IMPACT**

It is important that each department and function take ownership in the procedures for their areas by participating in the writing and updating processes. However, since the process will be new to many employees, Evergreen suggests that a facilitator be hired to work with each department over a period of six months to train staff and assist them in pulling together the initial documentation. The estimated one-time cost for this facilitation is $150,000.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop Standard Operating Procedures</td>
<td>($150,000)</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>
CHAPTER 3:
FINANCIAL MANAGEMENT
3.0 FINANCIAL MANAGEMENT

Municipal governments must practice sound financial management in order to maximize the effectiveness of limited resources and to plan for future needs. Effective financial management ensures that internal controls are in place and operating as intended, technology is maximized to increase productivity, and reports are generated that help management reach its goals.

For purposes of this study, Financial Management includes the following eight sections:

- 3.1 Financial Management and Accounting
- 3.2 Comptroller/Investments/Payroll
- 3.3 Management and Budgets
- 3.4 Bond Issuance and Indebtedness
- 3.5 Tax Assessor/Collector
- 3.6 Purchasing
- 3.7 Accounts Payable
- 3.8 Policies and Procedures

The General Fund is the primary operating fund for the City of Norwalk. This fund accounts for all financial resources of the general government, except for those required to be accounted for in another fund. In addition, the City maintains a Capital Projects Fund to account for the resources used for capital expenditures or for the acquisition or construction of capital facilities. To account for the operation of the City’s Wastewater Division and the City’s Parking Facilities, individual proprietary funds are utilized. To account for the internal services of employee health insurance and vehicle maintenance and fuel, individual internal service funds are utilized.

Trust and agency funds account for pension and other employee benefits, scholarship awards, and student activities.

The City’s fiscal year runs from July 1 through June 30 of each year. For FY 2021, the General Fund budget supports spending for 696 employee positions. The City adopted its FY 2021 Budget with a balanced budgeting approach and a focus on the Mayor’s vision for the growth for the City in critical economic and community development areas.

Some of these areas included:

- preserving Norwalk as a preferred destination for diverse businesses and industries operating locally, within the Northeast corridor and globally;
- providing families with exceptional education within a safe, nurturing, and healthy environment; and
- improving in the timely and cost-efficient delivery of government services that meet the diverse needs of Norwalk residents and taxpayers.
Exhibit 3-1 shows actual revenues for General Fund for FY 2021 and original and final budgeted revenues for FY 2021.

**Exhibit 3-1**

**General Fund Budgetary to Actual Revenues**

**FY 2021**

<table>
<thead>
<tr>
<th>Description</th>
<th>Original Budget</th>
<th>Final Budget</th>
<th>Actual</th>
<th>Favorable (Unfavorable) Variance with Final Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td>Taxes, interest, and lien fees</td>
<td>$345,420,759</td>
<td>$345,420,759</td>
<td>$348,158,184</td>
<td>$2,737,425</td>
</tr>
<tr>
<td>Intergovernmental</td>
<td>$16,792,651</td>
<td>$16,792,651</td>
<td>$19,041,993</td>
<td>$2,249,342</td>
</tr>
<tr>
<td>Licenses, permits, fees and other</td>
<td>$13,321,844</td>
<td>$13,321,844</td>
<td>$18,220,707</td>
<td>$4,898,863</td>
</tr>
<tr>
<td>Interest</td>
<td>$1,500,000</td>
<td>$1,500,000</td>
<td>$402,249</td>
<td>$(1,097,751)</td>
</tr>
<tr>
<td><strong>Total Revenues</strong></td>
<td><strong>$377,035,254</strong></td>
<td><strong>$377,035,254</strong></td>
<td><strong>$385,823,133</strong></td>
<td><strong>$8,787,879</strong></td>
</tr>
</tbody>
</table>

Source: Budget and Actual Data from Comptroller, 2021.

Exhibit 3-2 shows actual expenditures for General Fund for FY 2021 and original and final budgeted expenditures for FY 2021.

**Exhibit 3-2**

**General Fund Budgetary to Actual Expenses**

**FY 2021**

<table>
<thead>
<tr>
<th>Description</th>
<th>Original Budget</th>
<th>Final Budget</th>
<th>Actual</th>
<th>Favorable (Unfavorable) Variance with Final Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Government</td>
<td>$5,490,474</td>
<td>$7,095,305</td>
<td>$6,022,693</td>
<td>$1,072,612</td>
</tr>
<tr>
<td>Community Service</td>
<td>$9,091,153</td>
<td>$9,533,929</td>
<td>$7,965,607</td>
<td>$1,568,322</td>
</tr>
<tr>
<td>Economic &amp; Community Development</td>
<td>$4,374,394</td>
<td>$4,721,094</td>
<td>$4,236,148</td>
<td>$484,946</td>
</tr>
<tr>
<td>Employee Benefits</td>
<td>$33,988,048</td>
<td>$33,988,048</td>
<td>$33,853,852</td>
<td>$134,196</td>
</tr>
<tr>
<td>Pension Funds</td>
<td>$13,172,540</td>
<td>$13,172,540</td>
<td>$13,120,526</td>
<td>$52,014</td>
</tr>
<tr>
<td>Police</td>
<td>$26,309,016</td>
<td>$27,103,501</td>
<td>$26,999,717</td>
<td>$103,784</td>
</tr>
<tr>
<td>Fire</td>
<td>$19,569,495</td>
<td>$20,041,651</td>
<td>$20,449,421</td>
<td>$(407,770)</td>
</tr>
<tr>
<td>Operations &amp; Public Works</td>
<td>$22,683,684</td>
<td>$23,564,162</td>
<td>$21,465,940</td>
<td>$2,098,222</td>
</tr>
<tr>
<td>Education</td>
<td>$208,415,928</td>
<td>$212,438,212</td>
<td>$208,383,524</td>
<td>$4,054,688</td>
</tr>
<tr>
<td>Contingency</td>
<td>$2,788,765</td>
<td>$65,807</td>
<td>-</td>
<td>$65,807</td>
</tr>
<tr>
<td>Debt Service</td>
<td>$32,446,428</td>
<td>$32,446,428</td>
<td>$31,603,627</td>
<td>$842,801</td>
</tr>
<tr>
<td>Finance</td>
<td>$6,621,281</td>
<td>$6,946,197</td>
<td>$6,106,498</td>
<td>$839,699</td>
</tr>
<tr>
<td>Organizational Memberships</td>
<td>$84,048</td>
<td>$84,048</td>
<td>$55,003</td>
<td>$29,045</td>
</tr>
<tr>
<td><strong>Total Expenditures</strong></td>
<td><strong>$385,035,254</strong></td>
<td><strong>$391,200,922</strong></td>
<td><strong>$380,262,556</strong></td>
<td><strong>$10,938,366</strong></td>
</tr>
</tbody>
</table>

Source: Budget and Actual Data from Comptroller, 2021.

### 3.1 FINANCIAL MANAGEMENT AND ACCOUNTING

The chief executive officer of the City is the Mayor, elected for a two-year term of office. An elected 15-member Common Council performs the legislative function. A Board of Estimate and Taxation, appointed by the Mayor and confirmed by the Common Council, is responsible for fiscal matters. The Mayor appoints the Chief Financial Officer (CFO). Under the direction of the
Mayor, the Chief Financial Officer has supervision over the Department of Finance and is responsible for the administration of the financial affairs of the City. The CFO is also responsible for Information Technology; however, that area will be covered more extensively in another section of this report.

Exhibit 3-3 provides a functional presentation of the Department of Finance.

Exhibit 3-3
Department of Finance Organizational Structure

Within the Department of Finance is the Comptroller’s Office where the responsibility for effective financial management through a strong internal control system exists. Other responsibilities of the Comptroller's Office include:

- maintaining and supervising the general accounting function for the city;
- managing the recording, depositing, and investing of funds;
- recording all financial transactions of the city including the processing of payroll for active employees and retirees of both the City and NPS;
- preparing the city’s financial reports in a timely manner and accepted format;
- providing accounting and reporting functions for special revenue grant programs; and
ensuring grant funds are expended in accordance with grant agreements and program objectives.

The Munis ERP System (MUNIS) is used for General Ledger, Accounts Payable, Requisitions, Purchasing, Budgeting & Position Control, Human Resources, and Payroll. The system is maintained by the City. The Novatime Technology Time and Attendance system (Novatime) is an electronic time and attendance system used to record employee time and sick and vacation accruals (including usage and balances). Data from Novatime are imported into the MUNIS Payroll System.

FINDING

There is inadequate segregation of duties within the Comptroller’s Office relating to Payroll. Key personnel from both the Comptroller’s Office and the Personnel Department have specific responsibilities in the entry of salary information into MUNIS for new hires to ensure accuracy and correctness of the salary and the employee deductibles.

In practice, once the HR Generalists in the Personnel Department have added a new employee’s demographic information into MUNIS, all salary-related data are entered by the Comptroller staff—including all changes to salary or deductibles that may occur after setup. This is done to eliminate the many errors that would occur.

The documented process is that all changes to payroll data (including new hires, terminations, pay rate changes and voluntary and mandated payroll deductions) must be authorized in a Personnel Activity Report (PARs) by the respective department head. The PARs must then be signed by the Director of Personnel or the Personnel Administrator. After proper authorizations, the form is forwarded to the Comptroller for input into the MUNIS system. Per the Comptroller, there is no process in place to review employee or pay rate information once it is entered into MUNIS. Other staff in the Comptroller’s Office also have access to enter new employees, change rates, and make payroll runs as it has been necessary to complete the tasks.

Per Accounting Tools (https://www.accountingtools.com) regarding payroll internal controls, this process is considered an internal control weakness as the same people have the ability to enter the data, make changes and write the checks. This creates an environment where an individual could set up a fictitious employee, pay them, and terminate the position without detection.

RECOMMENDATION

Recommendation 3-1:

Segregate payroll duties by having Personnel staff set up employees and Comptroller staff prepare the payroll and process payments.

A shifting of responsibility to the Personnel Department of existing staff, as per the documented process, would remedy the situation. Given that payroll costs represent 25 percent of the City’s total expenditures, it would be prudent to take the necessary measures to contain these costs and prevent any unnecessary, unauthorized costs.
FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

There is currently no process for reviewing the master employee database file. This is a step that should be completed by the Personnel Department as the owners of this information however staffing shortages and a lack of assigned expertise in the Personnel Department have led to the current practice. The Comptroller’s Office has always had the responsibility of ensuring that the master employee database is properly maintained and due to a lack of delegation to and ownership by the Personnel Department they have continued to do so.

The City should create the segregation of duties needed between the Personnel Department and the Comptroller’s Office to ensure the accuracy and correctness of the master employee database file. The integrity of the internal controls over data maintenance will no longer be compromised and an additional layer of review will further enhance the process.

RECOMMENDATION

Recommendation 3-2:

Once the Separation of Duties Control has been implemented and is working properly, restrict the ability to “add/change/delete” sensitive employee records (such as salary and related data) to the Personnel Department.

The Personnel Department should periodically review these records to prevent and catch errors, and also to ensure that unauthorized changes have not been made.

FISCAL IMPACT

This recommendation can be implemented with existing Comptroller resources; however, it will require additional Personnel Department resources and/or training of Personnel staff. The cost for hiring an additional staff person in Personnel is recognized in Chapter 4- Human Resources and identifies the need for additional expertise and training to fully implement this recommendation.

FINDING

Novatime is the system of record for employee time records for City employees, and it is the system of record for all sick, vacation and personal time accruals (both usage and balance). The system uses electronic time clocks to record the scheduled and actual start and end time for all hourly employees, and to record when salaried employees are working or using personal time.

Automated timekeeping systems, like Novatime have a number of built-in controls, such as only allowing employees to clock in or out for their designated shifts and not allowing
overtime without a supervisory override. The City is minimizing the potential for payroll calculation errors by using the automated system.

An essential part of municipal government operations is the Risk Management function. Given the rising costs of health, property, and liability insurance coverage, it is imperative that administrators maintain cost containment programs. Safety and security concerns should be included in such programs to manage the related costs. Successful risk management programs start with strong support from the governing body and senior financial administrators. Their continued commitment to the fundamental goals of risk management is essential if risk management practices are to be effective.

COMMENDATION

The City is minimizing the potential for payroll calculation errors by using the automated system.

FINDING

The City currently has no Internal Audit function.

The City had an internal auditor until 2015 when the individual was promoted into a finance position and the open position was not filled. One issue with the previous position was that it reported directly to the Chief Financial Officer. Working and reporting independently and objectively is the key that allows the auditor to perform their role effectively and really add value to the organization. Otherwise, their function will be discredited by other functions and departments. Per the Institute of Internal Auditors Professional Standards, functional reporting is an important factor that determines the independence of internal audit activities and should be to the board, audit committee, or equivalent level.

An internal auditor can help determine if money is spent appropriately and if it is used efficiently. The internal auditor can also review all areas of operations and make assessments regarding efficiency in operational processes and procedures.

A study completed by the Institute of Internal Auditors revealed that the effective size of an internal audit department is influenced by many variables that are specific to each organization, such as the internal audit mission, tools used by internal auditing, and the reliance on noninternal audit departments to perform risk management activities.

Exhibit 3-4 provides examples of objectives to be included in the internal audit mission.
According to market research firm IDC (International Data Corporation), an organization loses around 20 to 30 percent in revenue due to inefficiencies every year. Convoluted and inefficient systems are all too often relied upon which wastes valuable time and money. Internal audits, that encompass the mission objectives listed above, evaluate those processes to identify and eliminate inefficiencies and facilitate business growth.

**RECOMMENDATION**

**Recommendation 3-3:**

**Hire an Internal Auditor to boost the City’s opportunity to identify risks, inefficiencies, and proactive responses.**

The position should administratively report to the CFO, but all reports should be provided directly to the Mayor to allow for independence and objectivity to audit any area within the City without limitations. The Internal Auditor should be responsible for developing a risk-based plan. He/she will achieve this objective after consultation with the Mayor, Finance Committee and maybe the CFO, department heads, and other stakeholders of the internal audit mission for the organization. The priorities of the internal audit activity should be consistent with the City’s goals.

**FISCAL IMPACT**

The cost for an Internal Audit Manager with a bachelor’s degree, five years of experience, and a CPA or CIA certification is $136,000 base salary and approximately $95,050 in fringe benefits for a grand total of $231,050.
3.2 **COMPTROLLER/INVESTMENTS/PAYROLL**

In addition to the Payroll processing discussed above, the Comptroller’s Office also manages the following areas:

- Cash Receipts
- Grant Revenue
- Tracking and Disposal of Capital Assets

### 3.2.1 Cash Receipts

All departments prepare cash for deposit and at the end of the day, the departments remit all cash in sealed bags along with backup and a Cash Receipt Transmittal (including the GL account numbers) to the Comptroller’s Office. The Administrative Support double checks all cash receipt information and prepares the batches for deposit, ensuring all is sealed.

At the end of the day, Administrative Support brings the cash to Tax Collector and the money goes in the vault and the armored car courier comes in to pick up the deposit. The armored car courier does not provide a receipt and proper deposits are verified as part of the bank reconciliation process. No cash is held in the Comptroller’s Office overnight.

All departments also prepare checks for deposit and send them to the Comptroller’s Office with a separate cash receipt transmittal for each register/department. The Comptroller’s Office scans the checks for immediate deposit into Webster Bank via Weblink. This produces a batch report, which the Senior Accountant reviews and posts as a manual journal entry. The Senior Accountant then signs the cash receipt transmittals and returns copies to the departments for their records.

**FINDING**

Cash collection procedures are not being followed. The departments that are collecting cash have weak to no controls in place. As an example, permit fees are being collected out in the field and sitting in the staff’s cars until they bring it into the office. Money is kept in desk drawers not necessarily locked up. Previous investigations for theft of funds have resulted in no documented changes in policy or procedures to minimize future loss. Separate cash receipt transmittal forms are being required by the Comptroller’s Office for every type of fund collected which seems redundant and unnecessary.

**RECOMMENDATION**

Recommendation 3-4:

**Develop a strong internal control system for cash collections.**

To do so, the Comptroller’s Office will need to first explore what is happening at the points of cash collection within the City departments. Based on that information, proceed to implementing processes needed to safeguard cash utilizing the following control points:

- establishing segregation of duties;
safeguarding cash in secure locations;
• using a lockbox to receive cash payments from customers;
• reconciling the cash balance on bank statements to the general ledger at least monthly;
• establishing a procedure to ensure that all cash receipts are recorded;
• having supervisors approve voided transactions and returns;
• petty cash fund audits and petty cash internal controls; and
• inspecting on a periodic surprise basis how the processes are working.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

3.2.2 Grant Revenue

Departments must receive Common Council approval to accept a grant for individual state grants. When these grants are awarded, they are signed and approved by the Common Council and the Mayor. Once approved and awarded, the Principal Accountant creates an account number in MUNIS to track expenditures, employees, and revenue for the grant. The reporting requirements and drawdown requests and other grant monitoring activities are prepared and performed at the department level.

Grant receipt recording is initiated when the Comptroller’s Office receives a notification from the State of Connecticut that the City will receive a grant payment. The Principal Accountant reviews the ACH and posts to revenue, then notifies the receiving department. The departments have access to MUNIS and can also monitor and review grant activity and receipts through the system. On a quarterly basis, the Principal Accountant prepares a grant reconciliation, which is then distributed to the various departments for their review.

FINDING

There is no grants management process in place. As noted above, the process is divided between the individual departments and the Finance/Comptroller’s Office. There is no one central location or person keeping track of grants. In previous years, the City had a full-time grants manager who actively looked for grants to support department needs. As an example, the Restorative Justice Program was started through a fairly substantial grant that the previous, full-time Grants Manager found.

The City recently hired a part-time Grants Coordinator whose primary function will be to assist in identifying, acquiring, and implementing a grants program in partnership with all City Departments, Boards and Commissions. She will be providing assistance to some departments that need help with the administrative burden associated with the grants and to other departments that need guidance on the process of applying and receiving the grants. Reimbursement grants are also a challenge as there is not enough knowledge about funds availability and the requests for reimbursement process.

At this time, there are one or more FTEs in each of the following areas as grant writers, project managers for grant-related projects, reporting grant progress and the like:
- Redevelopment Agency
- Fire Department
- Police Department
- Public Works
- Health Department
- Transportation, Mobility and Parking
- Economic and Community Development

This list is not inclusive as the City is not using the MUNIS Grant module to track all grants outstanding in the City, and efforts to gather information on all current and proposed grants from the departments were only partially successful.

An inefficient grants management process can lead to these common problems:

- no one understands the entire detailed process;
- accounting information is not easily accessible;
- no communication protocols;
- departments apply for grants that may not be useful or necessary;
- reimbursement requests are not reconciled to the general ledger;
- non-compliance with grant provisions;
- grants are not billed and collected timely; and
- grants are missed that would benefit the organization.

An efficient and effective grants management program will maximize revenue sources and advance the goals of the organization. Proper controls must be in place to facilitate the application, tracking, and monitoring of these grants. Adequate resources are necessary to allow the City to compile an inventory of existing grants, identify new grant resources, and develop control mechanisms assuring reporting and compliance requirements are met.

RECOMMENDATION

Recommendation 3-5:

Develop a robust grants management program.

The City should explore the use of the MUNIS grants management module to automate the grants management process where possible. Every grant should be set up separately in the system to be tracked and reconciled. Quarterly status reports should be reviewed by the departments to assure that the grants are being spent, billed, and collected in a timely manner. Training should be provided for all roles of the grants management process as it is implemented.

A protocol for writing and submitting the grants for approval should also be developed. The full-time Grant Coordinator position should be created and work closely with the Director of Management and Budgets and the Comptroller in this process.
FISCAL IMPACT

A MUNIS upgrade in September may already include any costs associated with the grants module. Additional costs for increasing the Grants Coordinator positions from part-time to full-time staff would be $91,986, which is the difference between the current part-time salary plus benefits of $43,926 and a full-time salary of $80,000 plus 69.89 percent benefits of $135,912.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Increase Grants Coordinator to Full-time</td>
<td>($91,986)</td>
<td>($91,986)</td>
<td>($91,986)</td>
<td>($91,986)</td>
<td>($91,986)</td>
</tr>
</tbody>
</table>

3.2.3 Tracking and Disposal of Capital Assets

The responsibility for preparing and maintaining capital asset records is shared between the department that has physical custody of the asset, the Purchasing Department, and the Comptroller’s Office. On an annual basis, the Comptroller reviews the fixed asset listing and scans for old items that are fully depreciated. For such items, the Comptroller may reach out to the department to determine whether the asset exists or should be written off.

Best practices per the GFOA (Government Finance Officers Association) www.gfoa.org stipulate that:

*Local, state, and provincial governments should establish a system for assessing their capital assets and then appropriately plan and budget for any capital maintenance and replacement needs.*

Capital assets include major government facilities, infrastructure, equipment and networks that enable the delivery of public sector services. This system should include a complete inventory and periodic measurement of the physical condition and existence of all capital assets. Procedures guiding the tracking of these assets and their disposal should also be included. Additionally, all requirements for assets purchased with federal funds should be adhered to.

FINDING

There is no formal process for disposals of assets and no formal fixed asset inventory policy in place. The disposal of surplus and obsolete equipment is occurring at least twice a year via a public sale handled by the Purchasing Department according to City Charter policy:

§ 1-220.1 Disposal of surplus or obsolete equipment.

*If a Department head determines that his Department has surplus or obsolete equipment for which there is no anticipation of need in the future and desires to dispose of the same, he shall so notify the Purchasing Agent by submitting to him a list of the equipment he proposes to dispose of. The Department head and the Purchasing Agent will indicate in writing on the list submitted that no item thereon has a fair market value greater than $1,000 and a copy of said list so certified shall be sent to the Mayor. A copy of such list shall also at the time be sent to all other city Departments. Subject to the approval of the Mayor, a public sale of such property shall be held on a date to be determined by the Purchasing Agent and the Department head which date shall be not less than 60 days after the approval of the Mayor.*
There shall be no more than two sales of surplus or obsolete equipment by any one Department in any one calendar year. The provisions of this section shall not apply to the sale of any city property having a value greater than $1,000.

The Comptroller was unaware of these surplus sales and was not getting a listing of the sold items.

Additionally, all assets are not being tagged appropriately for identification. Capital assets purchased with Federal Grant funds are not identified and tracked. IT assets are the only ones tagged by the IT Department. For financial reporting purposes, the City Comptroller maintains records concerning fixed assets for the City. She uses financial records from MUNIS to update the City’s fixed asset ledger incorporating significant new additions or deletions to the ledger. It does not appear that there is any process in place to identify the source of funding for major new asset acquisitions.

**RECOMMENDATION**

Recommendation 3-6:

**Develop and implement a formal policy documenting the disposal of assets, the inventory of assets, and the tracking of assets.**

Proper accounting for deletions of your capital assets is required for accurate record keeping. Having a separate approval process performed prior to the actual disposal of the asset helps ensure that assets are validly removed. A form should be utilized that captures all of the pertinent information to identify and remove assets from the system including proper authorizations.

To ensure the capital asset listing is up to date with assets still in use, it is recommended that a physical count of the capital assets is performed on a periodic basis. The capital assets listing should be updated if there are assets that are no longer at the organization’s premises as a result of the physical count.

All assets should be tracked by capturing what funds they are purchased with and tagging them for proper identification after placing in use. Federal Grants Management requires recipients to have in place an inventory management system to track items purchased with federal funds. It is impossible to demonstrate that items purchased with federal funds comply with cost principles, and benefit the applicable program, if the items cannot be tracked and located by the federal grant recipient.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**3.3 MANAGEMENT AND BUDGETS**

The budget function for the City is usually managed by the Director of Management & Budgets and an Assistant Director of Management and Budgets. Both positions were vacant at the time of the one-site work, however, the Director position was filled in January 2022. The Director’s position is a direct report to the Chief Financial Officer.
Exhibit 3-5 provides a narrative of the actual budget process along with the corresponding dates for the FY 2021.

**Exhibit 3-5**  
**Budget Process**  
**FY 22**

D. **BUDGET PROCESS**

The Common Council is the legislative body of the City of Norwalk. The City’s Charter gives certain administrative powers exclusively to the Council and other powers jointly to the Council and Mayor. The budget process begins in September nine months before the start of the fiscal year following July when the Finance Department prepares a two-year forecast of revenues, expenditures, and the resulting tax rates to continue current government operations. These “pro forma” financial projections are then reviewed with the Mayor to elicit the administration’s goals and guidelines for the upcoming budget year.

The Board of Estimate and Taxation serves as the city’s fiscal authority and budget-setting body. The powers and duties of the Board of Estimate and Taxation include: adopt the Annual Operating Budget (subject to the maximum limit on total appropriations set by the Common Council), levy taxes and set the city’s property Tax Rates (mill rates), approve supplemental appropriations during the course of the fiscal year, and authorize the financing of the city’s Capital Budget and approve all borrowing by the city. The body also appoints the city’s independent auditor.

After incorporating the Mayor’s goals into the preliminary budget projections, the Finance Department sends detailed budget packages together with general assumptions and spending guidelines to the city’s departments and agencies. The departments spend approximately six weeks developing their budget submissions. The Finance Department compiles these requests before meeting with each entity to review the details of their budget requests.

The Chief Financial Officer is required under the City Charter to transmit the departmental requested budgets together with his recommendations to the Board of Estimates and Taxation on the second Monday in February (5 months before the start of the new Fiscal Year) and to the Common Council the following Tuesday. The Finance Department meets with and assists the members of the Common Council who must set a preliminary operating budgetary cap on the fourth Tuesday in February.

The Board of Estimate and Taxation (BET) conducts working sessions with each department and agency to develop its recommendations. The BET then holds a public hearing on the first Monday in April prior to submitting its recommendations to the Common Council. The Council reviews the BET’s recommendations and may adjust the cap by the third Tuesday in April. The tentative budget is advertised in a local newspaper and the final budget and tax levy are approved by the BET on the first Monday in May. The table on the following page illustrates the major touchpoints throughout the budget process.

Source: Approved Operating Budget Book Fiscal Year 2021-22.
Exhibit 3-6 reflects where on the budget process timeline the Residents, Mayor and Councils, and City Administration are engaged in the process.

**Exhibit 3-6**

**Budget Timeline**

**FY 22**

<table>
<thead>
<tr>
<th>RESIDENTS</th>
<th>MAYOR &amp; COUNCILS</th>
<th>CITY ADMINISTRATION</th>
</tr>
</thead>
</table>
| **NOVEMBER** | Input through direct contact with Mayor, Common Council and Community meetings. | **MAYOR**
  - Mayor reviews pro-forma financials, goals and objectives | **CFO** prepares pro-forma financial projections and two year forecast. |
| **DECEMBER** | Proposed budget published in the local newspaper. | **BOARD OF ESTIMATE & TAXATION (BET)**
  - BET commences budget review on the fourth Monday in February | **BET** submits the recommended budget to Board of Estimate and Taxation on the second Monday in February. And, to the Common Council the immediately following Tuesday. |
| **JANUARY** | | **COMMON COUNCIL**
  - Common Council establishes cap on total appropriations. | **BET** publishes the proposed budget in the local newspaper five days prior to the fourth Monday in February. |
| **FEBRUARY** | | **BOARD OF ESTIMATE & TAXATION (BET)**
  - BET conducts proposed budget review meetings with city departments and agencies. | **BET** holds public hearing no later than the first Monday of April. |
| **MARCH** | The Board of Estimate and Taxation hears all public input. | **BET** forwards its tentative budget to the Common Council no later than the first Monday of April. |
| **APRIL** | Tentative budget published in local newspaper. | **COMMON COUNCIL**
  - The Common Council sets its final cap on total appropriations no later than the third Tuesday in April. | **BOARD OF ESTIMATE & TAXATION (BET)**
  - The BET meets to adjust the budget in accordance with the final cap. |
| **MAY** | | **BET** publishes tentative budget in the local newspaper three days before the fourth Wednesday in April. |

**FINAL CITY BUDGET ADOPTION AND IMPLEMENTATION**

*Source: Approved Operating Budget Book Fiscal Year 2021-22.*
The highlights of this process include the fact that the Board of Estimate and Taxation (BET) is the City’s fiscal authority and budget-setting body. They adopt the budget; set the City’s property tax rates, approve supplemental appropriations, and approve the Capital budget and related debt issuances. The City Charter reference for the Board:

§ 1-288. Board of Estimate and Taxation; appointment, qualifications, term and compensation; vacancies. (Sp. Laws 1913, No. 352, § 88; Charter Amendment 8-29-1978; 1 Charter Amendment 8-10-1982. 2)

There shall be in said city a Board of Estimate and Taxation composed of six electors who shall serve without pay. Said members shall be appointed by the Mayor, subject to approval by the affirmative votes of a majority of the membership of the Common Council, and there shall be not more than two members from any one Council District, and not more than three appointed members shall belong to the same political party. Whenever a vacancy shall occur in said Board, the Mayor shall, subject to approval by the affirmative votes of a majority of the membership of the Common Council, appoint a member for the balance of the unexpired term. Such balance of unexpired term shall be considered as a full term for the purpose of tenure as hereinafter provided. Each term of membership shall be of four years’ duration, and no member shall serve more than two consecutive terms unless the Mayor’s appointment for a third term shall be approved by the affirmative votes of 2/3 of the membership of the Common Council, and in no instance shall an appointed member serve more than three consecutive terms. Within one week after taking office in 1983, the Mayor shall appoint one member for a term of two years and one member for a term of four years, and biennially thereafter, within one week after taking office, the Mayor shall, in the manner herein provided, appoint three members of said Board, each for a term of four years. Such appointments are subject to approval by the affirmative votes of a majority of the membership of the Common Council.

The BET consists of six appointed members and the Mayor serves as an ex-officio member. The members of the BET are appointed to overlapping four-year terms by the Mayor, subject to confirmation by the Common Council. No more than two appointed members can reside in any one Council District, and not more than three appointed members shall belong to the same political party. The appointed members of the BET must be electors of the City of Norwalk, and they serve without pay.

The Chief Financial Officer (CFO) transmits the departmental budgets with his recommendations to the BET. He believes the budget process works well, but has concerns regarding the Norwalk Public Schools (NPS) component of the overall budget. NPS appears in the budget as a department (labeled Education) of the City much like the Police, Fire, and Community Services Departments appear. NPS typically carries 50 percent or more of the grand total for expenditures as noted in Exhibit 3-7. This exhibit reflects the expenditures budget for FY 21 and FY 22 and the variance between the two years.
Exhibit 3-7
City Budget Expenditures
FY 21 and 22

<table>
<thead>
<tr>
<th>Department</th>
<th>Approved Budget FY 2020-21</th>
<th>Approved Budget FY 2021-22</th>
<th>FY 2021 Vs. FY 2022 Variance (Favorable / Unfavorable)</th>
<th>FY 2021 Vs. FY 2022 Variance (Favorable) / Unfavorable</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contingency</td>
<td>$2,788,765</td>
<td>$1,500,000</td>
<td>$(1,288,765)</td>
<td>(46.2%)</td>
</tr>
<tr>
<td>Education</td>
<td>$208,415,928</td>
<td>$208,468,385</td>
<td>$52,457</td>
<td>0.0%</td>
</tr>
<tr>
<td>Police &amp; Fire</td>
<td>$45,878,511</td>
<td>$47,517,888</td>
<td>$1,639,377</td>
<td>3.6%</td>
</tr>
<tr>
<td>Employee Benefits</td>
<td>$33,988,048</td>
<td>$35,078,683</td>
<td>$1,090,635</td>
<td>3.2%</td>
</tr>
<tr>
<td>Debt Service</td>
<td>$32,446,428</td>
<td>$36,925,620</td>
<td>$4,479,192</td>
<td>13.8%</td>
</tr>
<tr>
<td>Operations &amp; Public Works</td>
<td>$23,223,684</td>
<td>$24,743,182</td>
<td>$1,519,498</td>
<td>6.5%</td>
</tr>
<tr>
<td>Pension Contributions</td>
<td>$13,172,540</td>
<td>$15,362,160</td>
<td>$2,189,620</td>
<td>16.6%</td>
</tr>
<tr>
<td>Community Services</td>
<td>$9,146,000</td>
<td>$9,769,752</td>
<td>$623,752</td>
<td>6.8%</td>
</tr>
<tr>
<td>Economic &amp; Community Development</td>
<td>$4,374,394</td>
<td>$4,895,866</td>
<td>$521,472</td>
<td>11.9%</td>
</tr>
<tr>
<td>Finance Department</td>
<td>$6,621,281</td>
<td>$7,038,014</td>
<td>$416,733</td>
<td>6.3%</td>
</tr>
<tr>
<td>General Government</td>
<td>$4,132,667</td>
<td>$4,396,482</td>
<td>$263,815</td>
<td>6.4%</td>
</tr>
<tr>
<td>Grants</td>
<td>$1,357,807</td>
<td>$858,035</td>
<td>$(499,772)</td>
<td>(36.8%)</td>
</tr>
<tr>
<td>Organizational Memberships</td>
<td>$84,048</td>
<td>$84,000</td>
<td>$(48)</td>
<td>(0.1%)</td>
</tr>
<tr>
<td><strong>GRAND TOTAL</strong></td>
<td><strong>$385,630,101</strong></td>
<td><strong>$396,638,067</strong></td>
<td><strong>$11,007,966</strong></td>
<td><strong>2.9%</strong></td>
</tr>
</tbody>
</table>

Source: Approved Operating Budget Book Fiscal Year 2021-22.

**FINDING**

Discord between the City and NPS regarding the budget is unproductive and infighting has resulted in a serious breakdown in communication and collaboration between and among the two functional components of the City.

Based on Connecticut State Law, what is known as a Minimum Budget Requirement (MBR)—puts limitations on the City’s budgeting as stated below:

*Connecticut’s MBR prohibits a municipality from budgeting less for education than it did the previous year, unless it meets specific exceptions. School districts that are in the top 10 percent of all school districts, according to the Connecticut State Department of Education’s (CSDE) accountability index, are exempt from MBR requirements. However, towns whose local public-school districts are Alliance Districts (the thirty-three lowest performing local public-school districts in the state) are not permitted to reduce educational expenditures and are not eligible for any of the MBR exceptions. As part of the biennial state budget passed in June 2019, the Connecticut General Assembly reauthorized the MBR requirements for fiscal years 2020 (2019-20 school year) and 2021 (2020-21 school year)*

*In 1975, the Connecticut General Assembly created the minimum expenditure requirement, which required towns to spend a minimum amount per pupil on education based on statewide expenditures. This requirement, now slightly altered and known as the MBR, was implemented to prevent towns from reducing their local spending on education and using state aid for education as a replacement for local funds, as well as to prevent towns from using state funds targeted for education for other purposes.*
This presents a constant challenge to the City as the cost of funding the schools rises. Property taxes are the primary source of funds used by the City to fund the schools; however, the City has been reluctant to increase taxes to support the rising educational costs. As a result, the City has tightened its own budgets to the point that many within the City government feel that the City’s current staffing levels can no longer support City services.

**Exhibit 3-8** shows peer comparison of property taxes as a percentage of total revenues for FY 2022.

**Exhibit 3-8**

**Property Taxes as Percent of Total Revenues**

**FY 22**

<table>
<thead>
<tr>
<th>City</th>
<th>Population</th>
<th>Total Revenue</th>
<th>Per Capita Revenue</th>
<th>Property Taxes</th>
<th>% of Total Revenues</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk, CT</td>
<td>91,184</td>
<td>$385,630,101</td>
<td>$4,229</td>
<td>$338,161,111</td>
<td>88%</td>
</tr>
<tr>
<td>Stamford, CT</td>
<td>135,470</td>
<td>$597,924,339</td>
<td>$4,414</td>
<td>$532,349,651</td>
<td>89%</td>
</tr>
<tr>
<td>New Haven, CT</td>
<td>134,023</td>
<td>$567,990,073</td>
<td>$4,238</td>
<td>$286,144,719</td>
<td>50%</td>
</tr>
<tr>
<td>Waterbury, CT</td>
<td>114,403</td>
<td>$421,264,894</td>
<td>$3,682</td>
<td>$256,952,067</td>
<td>61%</td>
</tr>
<tr>
<td>Danbury, CT</td>
<td>86,518</td>
<td>$335,780,841</td>
<td>$3,881</td>
<td>$217,930,000</td>
<td>65%</td>
</tr>
<tr>
<td>Average (w/o Norwalk)</td>
<td>117,604</td>
<td>$480,740,037</td>
<td>$4,054</td>
<td>$323,344,109</td>
<td>66%</td>
</tr>
</tbody>
</table>

*Source: Phone calls to Peer Organizations, January, 2022.*

At this time, the NPS is funded primarily by local funds. **Exhibit 3-9** shows funding sources based on the approved budget for FY 22.

**Exhibit 3-9**

**NPS Funding Sources**

**FY 22**

<table>
<thead>
<tr>
<th>City</th>
<th>Programs</th>
<th>Grants</th>
<th>Food Service</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>$208,468,385</td>
<td>$354,013</td>
<td>$30,456,855</td>
<td>$6,408,882</td>
<td>$245,688,135</td>
</tr>
<tr>
<td>84.9%</td>
<td>.14%</td>
<td>12.4%</td>
<td>2.6%</td>
<td>100%</td>
</tr>
</tbody>
</table>

*Source: NPS Approved Operating Budget Book Fiscal Year 2021-22.*

Some argue that the State should be picking up a larger portion of the money needed to fund education, but until such time as the State’s formula funding practices and procedures change, the City of Norwalk is responsible for 85 percent of the NPS budget.

Although the NPS budget was kept flat in FY 22 compared to the prior year, this was made possible by federal dollars that came from the American Rescue Plan Act of 2021 and the Secondary School Emergency Relief Fund that the School received from the State of Connecticut relating to COVID relief. Those funds will not be available in future years.

To add yet another layer of complexity, the NPS has its own governing Board of Education that determines and guides them on how their appropriation from the City is spent each year. Once the City approves the NPS budget, the City has no input into how the money is actually spent.
During interviews with leadership and members of the Common Council, many said they felt that NPS’s budget is excessive and overstated. Examples were provided of instances where NPS requested additional money for a specific purpose and used the funds for other purposes, but others indicated that NPS did not provide financial reports to the Common Council, so they were never apprised of how the money was spent. Many years ago, in reaction to allegations that funds requested for textbooks were actually not used for textbooks, the City implemented a practice of paying for textbooks with Capital dollars so that all textbook expenditures would have to go through the Common Council’s Land Use Committee for approval. The practice remains in effect today, but the minutes from those committee meetings specifically state that the committee is NOT reviewing or approving content, but only the purchasing methods used for the procurement. The effect is the same, and this example was brought up by both City and NPS leadership, many saying it was a punitive measure to assert the Common Council’s authority over at least one component of the NPS budget.

In addition to the NPS operating budget funded by the City, the City also funds NPS capital expenditures, some of which are eligible for state reimbursements, such as funds for facility construction and renovations. A FY 22 capital project budget report reveals that NPS capital projects total gross $4,740,740 with an expected revenue offset of $240,740 for a net capital project cost of $4,500,000 to be funded by the City. The City also made debt payments for FY 21 totaling $32.4 million. Forty-eight (48) percent of the payments were attributed to NPS debt.

A Joint Education Finance Committee (consisting of members from the BOE Finance and City Common Council Finance committees) had been formed to facilitate conversations about the NPS budget before it is adopted. The Committee has met three times since being formed—once in 2020 and twice in 2021.

The animosity between NPS and City governance and leadership is brought to a head during the budget process, but the constant tension is a year-round issue. During the last year, the schools identified a facility that they wanted to purchase to house centralized student registration and access to a variety of family focused services, but the City denied the request. NPS partnered with the Human Services Council to lease space in their building for the center. The Family Center was established through funding provided by the Elementary and Secondary School Emergency Relief (ESSER) III grant. The priorities identified under the grant include the direct engagement with families and the community. Per the former NPS CFO, a lease of the building does not require approval from common council and this action was not received well.

Based on an article published by the organization, Great Schools for All ConnCAN, entitled “School Finance in Connecticut: ”

Connecticut follows National School funding patterns in some ways, but several unique factors have led to a particularly complicated school finance system. Connecticut ranks close to the bottom in the percent of school funding that comes from the state (39 percent, compared to a 49.5 percent national average). Nationally, the trend is toward increased state education funding, but Connecticut still relies heavily on local property taxes to fund schools.
A significant component of the state funding formula is the town wealth calculation. In theory, this calculation provides wealthier towns with less state funding and poorer towns with more to make up for their lack of property tax revenue. The wealth calculation combines the town’s average property tax base and the town’s average income. The City of Norwalk is listed in the top 10 ranking of property wealth towns in 2021 per an analysis completed by HomeSnacks (https://www.homesnacks.com).

RECOMMENDATION

Recommendation 3-7:

Develop a plan for the Joint Education Finance Committee to meet quarterly to begin to open the lines of communication.

This Committee can also be a platform for much needed open communications beyond the budget matters between the City and NPS. All other issues concerning staff and shared challenges could be brought to the table and discussed openly as a team seeking shared solutions. Agenda items can include requests for additional funding with appropriate justifications, but should also encompass other priorities that impact both organizations. All discussions within the Committee and outside of it should be mutually respectful toward its members and factually based regarding its topics.

Peer cities who are facing similar budget challenges should be contracted to explore budget scenarios and allocations not considered. Substantive questions about spending efficiency to glean different ways to achieve desired goals should be addressed.

A sincere effort to talk and discuss all of the concerns regarding the Budget and other Finance matters from both the City and NPS perspectives should begin. It is inevitable that conflicts will arise; however, they can and should be resolved by mutual understanding between the two organization. Both have important work to do for the same community drawing on the same financial resources for the welfare of the same taxpayers. They should strive always to work together for causes which are of mutual interest.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

As mentioned in Exhibit 3-7 above, the Board of Estimate and Taxation requires that departmental requested budgets be submitted for review at least five months prior to the new fiscal year start. The BET conducts working sessions with each department to develop recommendations. A public hearing is held before taking the budget recommendations to the Common Council. Final approval after any caps applied by the Common Council takes place on the first Monday in May. Once the budget is set, the BET has granted $5,000 in authority to the CFO for budget transfers within a department. Anything above that amount must go back to the
BET for approval. This process limits continuous workflow and delays vital financial decisions. It is not clear whether this $5,000 threshold is based on a particular statute or city ordinance.

RECOMMENDATION

Recommendation 3-8:

Review the statutes and ordinances to determine the law relating to the thresholds and types of amendments requiring BET approval.

Corporate Counsel should be engaged to determine the basis for the current threshold and assess the possibility of establishing an agreement locally that would allow greater authority for the CFO to move money within a department. Currently there is a vacancy, and the department head would like to move money over to cover the expense of temporary help to fill the need. No action can be taken until the BET approves this according to the current process.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The Personnel Department enters new hire information into MUNIS, including a position control number, but they do not use position controls for budgetary planning purposes. A position should exist in the organization for the current roles. The profile of the positions should be well-defined, and the positions should be represented by a unique ID (position control number). This way information about the positions can be tracked over time.

Position control makes it easy to budget or to analyze employment levels, regardless of vacancies, part time or shared positions. A Position Control System is better than traditional employee-based systems. An employee-based system is difficult to budget or to analyze employment levels regardless of vacancies, part time or shared positions, etc. Position data are so crucial to identify vacancies in the organization, to identify whether the position is over or under the budget, and also recognize the category the position falls into. Position information also acts as a determinant for vacancy tracking, budgeting, and history tracking.

RECOMMENDATION

Recommendation 3-9:

Use position control as a budgetary tool and establish guidelines for adding new positions or changes to positions.

FISCAL IMPACT

As noted earlier, this recommendation can be implemented with existing Financial Management resources; however, it will require additional Personnel Department resources and/or training of
Personnel staff. The cost for hiring an additional staff person in Personnel is recognized in Chapter 4 - Human Resources and identifies the need for additional expertise and training to fully implement this recommendation.

3.4 BOND ISSUANCE AND INDEBTEDNESS

The largest single sum of money that most municipalities will receive at one time will be the proceeds from a municipal bond issuance. Bonds are authorized by the voters and sold by the City for large projects to spread the cost over time to succeeding users of the facilities. When bonds are sold, the City is agreeing to pay interest to the buyers on a set schedule and soon after bonds are issued, the debt-service payments begin. Funds must be set aside to make payments on the debt.

The City issues general obligation bonds to provide funds for the acquisition and construction of major capital facilities. General obligation bonds have been issued for both governmental and business-type activities. General obligation bonds are direct obligations of the City for which full faith and credit are pledged and are payable from taxes levied on all taxable properties located within the City. Certain general obligation bonds are to be repaid by revenues of the enterprise funds.

The State of Connecticut, under the Clean Water Fund Program, issued the project loan obligation. The loan proceeds financed the sanitary sewer construction projects. The obligation will be paid from future user fees.

The Drinking Water Fund Program issued a permanent funding obligation loan, which is recorded in the Water Fund, for the year ending June 30, 2020. The loan proceeds are being used to finance the upgrade to the Broad Brook Treatment Plant. The obligation will be paid from future user fees.

FINDING

The Comptroller and CFO monitor compliance with financial covenants. On a monthly basis, the Comptroller reviews all debt obligations to ensure compliance requirements are met. Any potential noncompliance is communicated to the CFO who will communicate to the bond counsel. Any noncompliance is communicated to the Board of Estimation and Taxation.

As of June 30, 2020, the City had a total of $287,709 million in debt outstanding consisting of clean water and drinking water fund loans of $14,379 million and the balance in general obligation bonds totaling $273,330 million.

COMMENDATION

The CFO demonstrated awareness and attention to maintaining the City’s AAA Bond credit rating with Standard & Poor’s and Fitch and Aaa with Moody’s.

The need for constraints had been identified in keeping with the following factors:
• level of debt not to exceed $400 million;

• percent of Annual Debt Service to Operating Budget not to exceed 10 percent (9.31 percent currently);

• healthy Unrestricted Rainy-Day Fund as percent of General Fund expenditures (16 percent currently); and

• monitoring borrowing capacity for future-$20 million allowable in each of next four years for new debt and $20 million available for new debt as old debt matures and is retired annually. Forty million dollars is available in total in each of next four years.

3.5 **TAX ASSESSOR/COLLECTOR**

Approximately 90 percent of all City revenues are assessed and collected by the offices of the Norwalk Tax Assessor and the Norwalk Tax Collector. To better understand the type of properties listed and valued for tax purposes the following excerpt is included from the State of Connecticut Office of Policy and Management website: Statutes Governing Property Assessment and Taxation (ct.gov):

**Connecticut’s Property Tax Framework**

There are 169 cities and towns in Connecticut. Each provides various services, such as public-school education, police and fire protection and public road maintenance. To a large extent, the property tax finances these services. Connecticut state law authorizes the taxation of property, including real estate, motor vehicles, business-owned personal property and some personal property that individuals own.

Local governmental officials administer the property assessment and taxation. State law governs the manner in which a town or city assessor determines property assessments and the procedures that tax collectors use to collect property taxes. State law also authorizes property tax exemptions, credits, and abatements. The processes are reviewed by the Connecticut Office of Policy and Management, which requires a number of reports throughout the year.

Some cities and towns contain specific taxing districts, such as fire districts, that provide services that the city or town does not provide. The assessment of property that a city or town assessor determines is the basis for the tax that a district collects.

In Connecticut, the assessment date is October 1 (Chapter 203 - Sec. 12-62a). Ownership of property on an assessment date makes a taxpayer liable for property taxes unless the property is exempt from taxation. Certain property may also be subject to taxation if located in any Connecticut municipality for a specific period of time prior to an assessment date (Chapter 203 - Sec. 12-43).

The grand list is a record of all taxable and tax-exempt property in a taxing jurisdiction as of the assessment date. Assessors file the grand list by the end of January, but some may do so...
by the end of February. If the assessment of real estate or personal property, other than a motor vehicle, increases from one assessment date to the next, an assessor must send an increase notice to the affected taxpayer (Chapter 203 - Sec. 12-55).

Real Estate

Real estate is all land and all improvements (such as buildings, fences, and paved driveways), as well as easements to use air space (Chapter 203 - Sec. 12-64).

With the exception of certain classified land, the assessment of each parcel of real property represents 70 percent of its estimated fair market value as of the date of a revaluation (Chapter 203 - Sec. 12-62, Sec. 12-62a and Sec. 12-63). Assessors value classified farm, forest, open space, and maritime heritage on the basis of use, rather than on a fair market value basis (Chapter 203 - Sec. 12-107b through Sec. 12-107f and Public Act 07-127).

Personal Property

In general, personal property is anything that is moveable and is not a permanent part of real estate, including items such as business-owned furniture, fixtures, machinery, or equipment, as well as horses and unregistered motor vehicles and snowmobiles that anyone owns (Chapter 203 - Sec. 12-71).

A taxpayer must file a Personal Property Declaration with the assessor of the city or town in which personal property is subject to taxation by November 1 annually (Chapter 203 - Sec. 12-41). An assessor may grant a taxpayer an extension of up to 45 days to file a declaration (Chapter 203 - Sec. 12-42). Nonresident taxpayers must also file a declaration (Chapter 203 - Sec. 12-43).

Motor Vehicles

In general, motor vehicles are subject to taxation in the city or town where, in the normal course of their operation, they most frequently leave from and return to or remain, although state law provides some exceptions to this general rule (Chapter 203 – Sec. 12-71).

The assessment of a motor vehicle is 70 percent of its average retail value. Assessors use average retail values that the National Automobile Dealers Association (NADA) compiles annually. Assessors are responsible for determining the value of any motor vehicle for which the NADA Guide does not provide an average retail value.

3.5.1 Tax Assessor

The Tax Assessor for Norwalk discovers, lists, and values all taxable and exempt property in the City of Norwalk. The types of property listed and valued for tax collection purposes include the following:

- Real Estate (includes residential and commercial)
- Personal Property (excluding residential furnishings, clothing, and jewelry)
• Motor Vehicles

**Exhibit 3-10** reflects the totals for the City of Norwalk for the FY 18, 19, and 20.

### Exhibit 3-10
**City of Norwalk Grand List Totals**  
**FY 18, 19, and FY 20**

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>Town Name</th>
<th>Net Real Property</th>
<th>Total Net Motor Vehicle</th>
<th>Net Personal Property</th>
<th>Total Net Grand List</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>Norwalk</td>
<td>$12,809,018,175</td>
<td>$664,628,305</td>
<td>$804,933,342</td>
<td>$14,278,579,822</td>
</tr>
<tr>
<td>2019</td>
<td>Norwalk</td>
<td>$13,157,380,860</td>
<td>$682,235,823</td>
<td>$831,991,416</td>
<td>$14,671,608,099</td>
</tr>
<tr>
<td>2020</td>
<td>Norwalk</td>
<td>$13,011,915,161</td>
<td>$711,261,387</td>
<td>$958,434,874</td>
<td>$14,681,611,422</td>
</tr>
</tbody>
</table>


The grand list is the culmination of a number of processes and tasks conducted by the Tax Assessor and his staff. The systems currently used are the Vision Computer Assisted Mass Appraisal (CAMA) software (online database for property valuations) and the MUNIS software to manage address data for system mailings. The Tax Assessor recently completed an upgrade of Vision CAMA to Version 8. The two systems do not currently interface which requires double input in some instances.

A list of department duties includes the following:

- valuing of all taxable property to establish the Grand List;
- appraising, classifying, and recording of taxable property;
- inspecting of existing properties, improved properties, and properties under construction to determine value of properties;
- maintaining and updating of information concerning land, motor vehicles and personal properties;
- preparing of Tax Maps and GIS parcel layer updates;
- periodic revaluing of all taxable property;
- reviewing and recording of authorized tax exemptions;
- projecting estimated values of proposed building or commercial developments for planning purposes; and
- coordinating assessment appeals.

Property record cards, public access terminals, tax maps reflecting property boundaries, the City's street index, and Norwalk's sales indices are all also available for public access through the Tax Assessor Department.
The current staff of eight (and other vacancies are expected)) in the Department for the City of Norwalk consists of the Tax Assessor and three Assessment Analysts covering personal property, motor vehicles, and real estate property inspections and valuations. One of those Assessment Analysts will be leaving in November 2021 for a new position elsewhere. The balance of the staff does the clerical support work and customer service at the windows open to the public. A deputy tax assessor position has been open for more than two years now due to challenges in finding qualified individuals and being competitive in the market. This position would typically manage the commercial real estate property inspections and valuations. A consultant has been contracted to oversee those duties.

Similar challenges existed in filling the Tax Assessor position finally filled in January 2020. The new leader was hired just before the COVID pandemic shut down hit nationwide. He began his position working remotely for most of the 2020 year and has continued to work remotely due to various challenges hampered by COVID.

Vacancies currently exist in a number of assessing offices in Connecticut municipalities making the hiring of qualified individuals more difficult.

**FINDING**

The Tax Assessor Department is lacking in sufficient supervision and expertise to successfully complete their tasks due in part to existing vacancies and time requirements.

The Tax Assessor who reports directly to the Chief Financial Officer has worked remotely in another state since being hired. The Assessor told the Evergreen Team that he held two staff meeting in the two years. Due to the animosity of staff and the lack of interaction between the different categories (motor vehicles, versus personal property, etc.), he determined they were not useful and discontinued the practice. In addition, two Assessment Analysts and a Data Assessment Technician serving the Elderly and Veterans Program of the Department all work remotely and have for all of 2021 with some flex scheduling periodically two to three days a week by two of those individuals.

The role of the Tax Assessor is to plan, organize and administer the activities and the statutory responsibilities of the Assessor’s office. He supervises and participates in the valuing of all taxable property to establish the Grand List. He also administers the activities of the Office through subordinates in the functional areas of appraisal, classification and recording of taxable property. Additionally, he supervises inspections of existing properties, improved properties, and properties under construction to determine value of properties. Lastly, he supervises the training and development of employees of the office. He has fulfilled these duties while working remotely and communicating via email and text messages. In addition to these duties the Assessor is responsible for handling legal challenges to assessment. He has supervised litigation of approximately 350 of the over 400 court challenges resulting from the 2018 Revaluation.

The Tax Assessor is working toward the CCMA designation although the City Job Description requires the attainment of the certification within two years of being appointed. The COVID pandemic cancelled all certification opportunities for the first 18 months of the Assessor’s tenure. The Assessor has completed two of the three courses required for certification receiving
excellent grades in each and is working with the Office of Policy and Management to complete the Certification.

The remaining two Assessment Analysts have the responsibility of assisting in appraisal and administrative work in the valuing of taxable property to establish the Grand List; performing responsible assessment work in the functional areas of real and personal properties or motor vehicle; and providing technical and administrative assistance to the Assessor.

The remaining staff of four hold clerical positions that include the responsibilities of general clerical work involving the valuing of property; organizing and performing technical data entry; and retrieving work related to the collection, analysis and processing of information in a variety of databases to assist in the establishment of the Grand List and related property information. They also answer all telephone and walk-in inquiries. They are to receive instructions from their supervisor and report work accomplished on a weekly basis. They work without any supervision most of the time and have sought out resources at the state level to get questions answered.

RECOMMENDATION

Recommendation 3-10:

Alter remote work schedules to bring more guidance to the staff and hands on expertise to the Tax Assessors Department.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

3.5.2 Tax Collector

The Tax Collector for the City of Norwalk bills and collects for current and delinquent real estate, vehicle and personal property taxes, interest fees, and other charges and special assessments. The Department also processes and deposits all payments and maintenance of all records in accordance with the provisions of the Connecticut General Statutes.

The City of Norwalk’s primary source of revenue in the General Fund is the Property Tax at 89.1 percent of total revenue. Of all the types of taxes, property taxes are the least susceptible to fluctuation. In good economic times, property tax revenues grow more slowly than income or sales taxes; but in a bad economy, property taxes are also the least likely to contract. This is especially true in the State of Connecticut, where real property is reassessed once every five years.

Property taxes are assessed as of October 1 and are levied for on the following July 1 prior to the beginning of the fiscal year. Real estate and personal property are due in two installments on July 1 and the following January 1. Motor vehicle taxes are payable July 1 and supplemental motor vehicle taxes are payable on January 1. Liens are filed on delinquent real estate taxes within one year. Statutory interest at the rate of 1.5 percent per month accrues on all overdue taxes.
According to the State of Connecticut Office of Policy and Management, the property taxes are arrived at by applying the mill rate (tax rate) as follows:

**Mill Rates** A mill is equal to $1 of tax for each $1,000 of assessment. To calculate the property tax, multiply the assessment of the property by the mill rate and divide by 1,000. For example, a property with an assessed value of $50,000 located in a municipality with a mill rate of 20 mills would have a property tax bill of $1,000 per year.

**Exhibit 3-11** reflects the Mill Rates approved for the City of Norwalk for FY 21.

### Exhibit 3-11
**Mill Rates by District**
for FY 21

<table>
<thead>
<tr>
<th>Approved Budget Mill Rates</th>
<th>First Downtown</th>
<th>Second South</th>
<th>Third East</th>
<th>Fourth Sewered</th>
<th>Fifth Main Area</th>
<th>Sixth</th>
<th>Tenth MV</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fire</td>
<td>2.485</td>
<td>2.485</td>
<td>2.485</td>
<td>2.485</td>
<td>2.485</td>
<td>2.485</td>
<td></td>
</tr>
<tr>
<td>Garbage</td>
<td>0.431</td>
<td>0.431</td>
<td>0.431</td>
<td>0.431</td>
<td></td>
<td>0.081</td>
<td>0.081</td>
</tr>
<tr>
<td>Lighting</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Motor Vehicle</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>30.383</td>
</tr>
<tr>
<td>6th District</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1.213</td>
</tr>
<tr>
<td><strong>Total 2021</strong></td>
<td><strong>23.956</strong></td>
<td><strong>23.956</strong></td>
<td><strong>23.956</strong></td>
<td><strong>24.037</strong></td>
<td><strong>23.606</strong></td>
<td><strong>22.252</strong></td>
<td><strong>30.383</strong></td>
</tr>
</tbody>
</table>

Source: Approved Operating Budget Book Fiscal Year 2021-22.

The work of the Department is conducted by the Tax Collector, Assistant Tax Collector, and six additional staff. Duties and responsibilities include the following:

- all current and delinquent billing and collection;
- computer processing involving initial and delinquent billings, and lockbox / tax services processing;
- monthly and yearly reports and reconciliations; customer service issues; refunds; bankruptcy filings;
- year round focuses on delinquent collections, tax sales and other enforcement measures;
- escrow account maintenance; adjusted bills / certificates of correction; refunds; online IVR and ACH posting;
- accounts receivable, refunds, and bank branch collection processing and reconciliations; and
- DMV issues, lien releases, and recordkeeping.

The staff level has not changed in 20 years in spite of the department taking on new responsibilities. They are now collecting more, in terms of the levy itself (actual dollars billed and collected), in number of accounts, and in types of charges.
The collection rate is a fairly good indicator of performance. The collection rates are set by the CFO and budget director and are intended to accurately predict revenues for the coming fiscal year. A high current and back tax collection rate still acknowledges that there will be some bills that are not timely paid; but that number is kept to a minimum. This allows the rate making authority (Board of Estimate and Taxation) to set lower mill rates, because there will be a smaller allowance for uncollected taxes (those that will not be timely paid).

Lower mill rates equate to “tax relief” for every single taxpayer – a lower mill rate means less dollars paid in taxes. High current and back tax collection rates thus promote fairness and equity and also work toward achievement of a higher bond rating, resulting in even more savings (on money that is borrowed, but at a lower interest rate).

Norwalk has the second highest collection rate among Connecticut’s six largest cities (according to the Office of Policy and Management Annual Report, April 2021). When being awarded the AAA bond rating the agencies have frequently referred to the tax collection rates and efficient and effective collection enforcement measures as contributing factors.

COMMENDATION

The Collection Department has consistently achieved the budgeted collection rates during each fiscal year and, subsequently within two to three years of the close of the fiscal year, do achieve close to 100 percent collection.

FINDING

There are three primary methods used by Connecticut municipalities to collect past due real estate taxes. There are situations when each of the three methods would be preferable and each has its own advantages and disadvantages. The methods are listed here:

- Tax Sale
- Tax Lien Assignment
- Foreclosure of tax liens

**Tax Sale** is the City’s preferred method of real estate collection enforcement, and the cornerstone of the collection activities. The Collection Department will typically hold a large sale every two years with approximately 200 to 250 properties to be sold. All the work is done in-house by the tax collectors’ office staff. Other towns often hire an outside attorney to do tax sale work and these attorneys typically charge $3,000 - $5,000 per property to do the work. These additional fees in excess of $1 million are not incurred by the City.

The tax sale process is orchestrated by the Tax Collector as well as the timing. The property sales are usually held in the summer. This facilitates the ending of the current year and starting the next with a healthy infusion of revenue. This timing also allows the department to take advantage of the heavy foot traffic in the City Hall during the spring and summer months. The posting of the tax sale properties creates interest and shows the public that the City is serious about collecting back taxes. This is a good message to send at a time when they are receiving their tax bills (June) and serves to reinforce the concept of the virtue of timely payment.
COMMENDATION

The City is achieving cost savings by not hiring outside tax attorneys to do the work of delinquent collections and utilizing the staff of the Collection Department.

3.6 PURCHASING

The purchasing function for the City of Norwalk is coordinated and managed by the Purchasing Agent under the direction of the Chief Financial Officer. The Purchasing Agent oversees a staff of two: an Administrative Assistant and a Buyer.

Departments participate in the procurement processes, but all formal competitive purchasing activities are managed in the Purchasing Office. The processing and payment of invoices for purchases is managed by the Comptroller’s Office which also reports to the Chief Financial Officer.

Exhibit 3-12 provides an overview of the purchasing thresholds and the types of competitive purchasing methods and approvals required within each category.
Exhibit 3-12
City of Norwalk
Purchasing Thresholds

City Purchasing Thresholds and Approval Paths

<table>
<thead>
<tr>
<th>Threshold or Procurement Type</th>
<th>Up to $999</th>
<th>$1,000 to $4,999</th>
<th>$5,000 to $19,999</th>
<th>Utilities (water, electric, etc. - Any Amount)</th>
<th>$20,000 to $24,999 (Up to $100,000 for Fire apparatus, Police or other Vehicles or the replacement of equipment)</th>
<th>$25,000 and Over</th>
<th>Emergency (Any Amount if there is a threat to public health, welfare, or safety under emergency conditions)</th>
<th>Single Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>Competitive Procurement Used</td>
<td>None Required</td>
<td>Request for Proposal quotations, either oral or written, solicited from at least two (2) vendors</td>
<td>Request for Proposal quotations, either oral or written, solicited from at least three (3) vendors</td>
<td>None Required</td>
<td>Competitive Sealed Submission Minimum of two (2) bidders</td>
<td>Such competition as is practicable under the circumstances</td>
<td>Department Head determines that only one source/vendor is available and writes justification</td>
<td></td>
</tr>
<tr>
<td>Funds Encumbered Prior to Purchase?</td>
<td>No - must be pre-authorized by the Purchasing Agent</td>
<td>Yes, if Purchase Order (PO) required. Not Required if a PO is not needed or if P.O. Card or other Credit Card used</td>
<td>No PO required and funds are not encumbered in advance. Payment Voucher (Pink Form) used to process payment.</td>
<td>Generally entered after bid opening and award amount is known</td>
<td>For purchases over $100,000, the Mayor appoints the selection committee; under $100,000 appointed by Purchasing Agent</td>
<td>Funding availability must be verified through the Comptroller’s Office, where practical, prior to any procurement, or as soon as practical after the procurement</td>
<td>Generally entered after amount is known</td>
<td>Purchasing Agent approves the written justification; also approves awards under $20,000</td>
</tr>
<tr>
<td>Required Approval</td>
<td>Department Head</td>
<td>Department Head</td>
<td>Department Head</td>
<td>Department Head</td>
<td>Purchasing Agent approves under $25,000</td>
<td>Common Council approves over $25,000</td>
<td>Purchasing Agent or a designee, any Department Head, the Mayor, the Common Council</td>
<td>Common Council approves single source procurements over $25,000</td>
</tr>
<tr>
<td>Documentation</td>
<td>Less Than $25,000: Purchase Orders are an accepted type of commercial contract for the procurement or lease or rental of supplies, services or construction. Purchase Orders, when read together with the bid documentation, form the entire contract between the parties; there is no separate agreement form signed by the supplier and the City.</td>
<td></td>
<td></td>
<td></td>
<td>$25,000 or More: Contracts allow for the inclusion of specific and protective terms and conditions in the performance of the project, and allow for the monitoring of the contractor’s compliance with these specific terms, to insure compliance, or, where necessary, to facilitate the City’s legal recourse where the contractor is in breach of the terms. In addition, with the inclusion of an indemnification/hold harmless clause and insurance clause, the City’s exposure to liability for any damage or injuries that occur as a result of the performance of the contract is greatly reduced.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: Compiled by Evergreen through document review and interviews, December 2021.
FINDING

The City’s Purchasing Guidelines have not been updated since July 2014 and do not meet the essential standards outlined in two CFR sections relating to federal awards.

In 2020, the External Auditor found that the City’s purchasing standards did not meet the essential standards outlined in two CFR Sections 200.318 and 200.328. The City concurred with the finding; agreeing to amend policy and procedure to comply,

In addition, a review of the Purchasing Guidelines revealed no guidance on the issuance or use of P-Card or other types of credit cards, which are currently used extensively by most departments. General guidelines and instructions for the use of P-Cards are available to staff at the time a card is issued, and the staff person is required to sign a form acknowledging their understanding of the rules.

City Ordinance states:

Pursuant to Charter § 1-241 of the Code of the City of Norwalk, a Procurement Guide may be adopted by a majority vote of the Common Council, which Guide shall govern the Purchasing Department. The Guide shall be reviewed by the Finance Committee no later than every three years following its adoption.

Although the Evergreen Team was told that policy changes were in progress, no draft of changes was provided.

The Guide itself is written in the form of a policy document rather than a user guide explaining how the various processes work. For example, the following excerpt describes the rights, powers, duties and authority of the Purchasing Department:

Part B - Organization of Purchasing Department

§2-201 Centralization of Purchasing. Except as otherwise provided in these Procurement Guidelines, all rights, powers, duties, and authority relating to the procurement of supplies, services, and construction, and the management, control, warehousing, sale, and disposal of supplies, services, and construction now vested in, or exercised by, any City governmental body under the several statutes relating thereto are hereby transferred to the Purchasing Agent, as provided in these Procurement Guidelines.

While policy statements are necessary and appropriate, particularly for the procurement processes, stipulating the legal parameters for purchasing is not always the kind of information that a user department needs when a clerical support person is attempting to enter a purchase requisition into the MUNIS system. A Purchasing User Handbook with step-by-step guidance, providing links to appropriate forms and documents and like, would be very useful for departments, especially when inexperienced staff are assigned to positions where purchasing is required.
RECOMMENDATION

Recommendation 3-11:

Immediately update the Purchasing Guidelines to be in compliance with City Ordinance, and simultaneously begin developing a user handbook providing the step-by-step instructions to carry out the stated policies.

The Finance Committee, in collaboration with Corporate Counsel, should immediately begin the task of updating the Purchasing Guidelines to ensure compliance with two CFR sections (200.318 and 200.328) relating to federal awards as well as any other outdated or missing areas of concern.

Simultaneously, the Purchasing staff should assemble a user working group to begin drafting a user handbook that addresses the needs of the departments.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The requirement for users to enter requisitions into MUNIS and obtain a purchase order prior to making purchases is not being strictly followed, which means that purchases can be made without the knowledge or approval of management and without regard to the availability of funds in the budget to cover the expense.

The Purchasing Guide Section 3-404 states:

All procurements, whether for single or multiple items, must be supported by a Purchase Order or other document appropriately encumbering the necessary funds which must be authorized in advance.

Encumbering funds essentially reserves the money that is needed to cover the cost of planned and authorized purchases. Although encumbered funds are not released until the payment for the future expenses is due, the funds cannot be used for anything other than their specified purposes. The MUNIS System has a powerful control process that begins at the time that a requisition is entered into the system. Once the requestor begins entry, the MUNIS controls are triggered. If there are insufficient budgeted funds remaining in the account code entered by the requestor, MUNIS will prevent the user from making the entry. At that point, the user must determine if the budget account code entered is incorrect or whether a request to move money into the account is necessary before a purchase can be initiated.

If sufficient unincumbered money remains in the budgeted line item, MUNIS then sends the requisition through a pre-set approval path beginning with the department head or principal and ending with a determination that a purchase order can be initiated to the vendor. At that point, the funds are encumbered, meaning that the funds cannot be used to purchase other items, thereby preventing the overspending of budgets.
Exhibit 3-13 illustrates the flow of processes approvals for purchases under $20,000. As shown, the City has implemented processes to handle the payment of invoices with or without a purchase order. Employees are encouraged to use P-Cards which, at this time, do not require a purchase order. Purchases made with P-Cards are recorded in the system when the credit card bill is paid.

Payment vouchers also bypass the need for a requisition and are used in limited instances. The Comptroller distributed the following guidelines concerning the use of Payment Vouchers:

- Membership Dues
- Employee Reimbursement
- Utility Bills
  - Cell Phones/Telephone
  - Water
  - Electricity
  - Cable TV
  - Fuels (Natural Gas, Diesel, Heating Oil, Gasoline, Propane)
- Postage
- Travel, Catering & Conference Expenses that cannot be paid on a City’s Purchase Card.

During interviews, staff indicated that when a purchase order has not been issued, the purchaser is required to enter the information after the fact so that the correct account codes can be used. If there is insufficient money in the account code, a request to move money from another account is made. None of the staff could recall a time when a purchase was rejected outright, or the item had to be returned to the vendor as a result of an unauthorized purchase. There is also no process in place to discipline employees that violate the policy.

Under §1-240 Division of Accounting and Treasury, the requirement to encumber the funds is emphasized as follows:

...[the Comptroller] shall keep separate accounts for the appropriations in the budget and the allotments thereof and shall encumber immediately each appropriation and each allotment for the amount of any purchase order, payroll or contract upon approval; he or she shall maintain for each account a record of the amounts paid and remaining unpaid, all encumbrances and unencumbered balances.

RECOMMENDATION

Recommendation 3-12:

Amend the Purchasing Guidelines to clarify that an approved purchase order is required prior to any purchase and if exceptions are to be made, the situation and circumstances for a waiver should be documented in the Guidelines.

Employees that continue to make purchases without following the restated Guidelines should be subject to appropriate discipline.
Exhibit 3-13
Purchasing of Goods or Services
Under $20,000

City Purchasing Under $20,000

Source: Compiled by Evergreen through document review and interviews, December 2021.
FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The Purchasing Thresholds shown above in **Exhibit 3-12** require the Common Council and the Committees of Common Council to review and approve purchases over $25,000, and in certain instances, the same purchases must be reviewed and reapproved multiple times.

As can be seen in **Exhibits 3-14** and 3-15 which follow, the processes for competitive purchasing for amounts over $20,000 is complex and controls are extensive. Depending on whether the solicitation is an Invitation to Bid (ITB), a Request for Proposal (RFP) or a Request for Quotation (RFQ) the solicitations and the final recommendation decisions are made following many levels of review.

A review of Common Council Action Items over the last year showed that various Common Council Committees submitted purchasing recommendations and changes at nearly every called meeting of the Council. Based on interviews and the Action Items, it appears that a single contract or project involving multiple contracts may require the review and approval of the Common Council and/or a Committee of the Common Council as many as ten times.
Exhibit 3-14
Process Flow for Invitations to Bid

City Purchasing Over $20,000 – Invitation to Bid

Source: Compiled by Evergreen through document review and interviews, December 2021.
Exhibit 3-15
Process Flow for Requests for Proposals for Requests for Qualifications

City Purchasing Over $20,000—Request for Proposal (RFP) and Request for Qualifications (RFQ)

- **Project Manager**
  - Decision to Purchase Made
  - Notify Purchasing Agent of Intent
  - Draft Solicitation and send to Purchasing
  - Project Manager enters the Purchase Order for the Contract into MIWIS to encumber the funds

- **Purchasing**
  - Reviews Draft Solicitation, Establishes Deadlines and leads in Bonfire
  - Sets up Selection Committee and provides committee members access to Bonfire
  - Strategic Sourcing Software (Bonfire)
  - Advertises solicitation on City Website and State of CT Portal and in Newspaper
  - Sends to Common Council committee of Common Council for Approval
  - Common Council approves Award
  - Corporate Counsel reviews contract—All parties Sign final contract
  - Contract document held by project manager and kept in contract file by Corporate Counsel

- **Bidders**
  - Interested Bidders sign on to Bonfire
  - Submits Questions
  - Attends a Pre-Bid Conference as needed, or required
  - Submits Bid or Proposal through Bonfire submits hardcopy and bid deposit to Purchasing

- **Selection Committee**
  - RFP and RFQ submissions received and reviewed in Bonfire
  - Screens submissions to create a short list, if applicable
  - Interviews short list of bidders, if applicable
  - Evaluates and makes a final selection based on lowest qualified and responsive submission

Source: Compiled by Evergreen through document review and interviews, December 2021.
This is especially evident with Capital Projects as shown in **Exhibit 3-16**:

1. Council Committees assigned by City Function (including the Land Use Committee) – Reviews and approves Capital Budget requests, including projects that may require multiple contracts to complete. The Land Use Committee is generally charged with reviewing project relating to land and buildings.

2. Finance Committee - Reviews and Approves the proposed Budget including all planned capital projects.

3. Common Council – Reviews and Approves the final Operating and Capital Budgets, including documentation provided by each committee relating to planned projects, contract extensions and the like.

4. Council Committees assigned by City Function - Works with the various departmental Project Managers and the Purchasing Agent to review solicitation documents. (May require multiple meetings).

5. Council Committees assigned by City Function - Reviews the award recommendations from the Selection Committee, Project Manager and/or Purchasing Agent and makes recommendation to the Common Council. (May require multiple meetings).

6. Common Council – Reviews and approves the Committee recommendations and authorizes the Mayor to execute one or more contracts for each project. (Approval generally includes a contingency amount of 5 to 10 percent for each contract, which can be authorized by the Purchasing Agent without the need to bring the item back to the Common Council.)

7. Council Committees assigned by City Function – If there is a need to change contract terms, extend due dates, authorize change orders above the contingency, or change account numbers to which the project is charged, the Project Manager and/or Purchasing Agent being the proposed changes to the committee for review. The Committee then refers the change to the Council for approval. (May require multiple meetings).

8. Common Council – Reviews and approves the recommended changes.

9. Council Committees assigned by City Function – Reviews the final project closeout documentation and the release of final payment to the vendor.

10. Common Council – Reviews and approves the recommended project acceptance.

In addition to the Common Council processes, numerous Boards and Commissions may also be involved in the decision-making processes and require staff time and interactions throughout the process. While the redundant approvals throughout the process provide a strong system of internal controls that serve to prevent abuse, this approval and reapproval system places a workload burden on the Common Council members, who also serve on multiple Council Committees, and staff indicated that the labor and time-intensive processes for even small contract modifications can cause significant project delays.
Exhibit 3-16
Capital Project Review and Approval Processes

(Flow assumes approval is given at each step— if approval is not given the project stops or the department continues to make modifications until approval is given)

Source: Compiled by Evergreen through document review and interviews, February 2022.
As shown previously in **Exhibit 3-12**, the City’s threshold for requiring competitive seal bid is $20,000, but Common Council is not required to approve the award until the cost exceeds $25,000. A review of purchasing guidelines among the peer cities found that many set the threshold for requiring a competitive sealed bid between $20,000 and $50,000. Yet, some authorized the Mayor or City Manager to approve the awards up to a given threshold without the need for approval by the governing board or council, as long as the purchase was being made within the approved budget set by the governing board or council.

For example, in Lynchburg, VA, the Procurement code gives the City Manager the following authority for small purchases defined as purchases under $50,000:

**Sec. 18.1-8. - Small purchase procedures.**

Subject to such small purchase procedures as are established in the procurement manual adopted by the city manager pursuant to section 18.1-12, the city manager, or those to whom he delegates authority, may enter into single or term contracts for goods and services other than professional services if the aggregate or sum of all phases is not expected to exceed $50,000.00. Such small purchase procedures shall provide for reasonable competition when practicable, including, without limitation, when such small purchases are for over $10,000.00, use of three quotes when reasonably practicable.

Additionally, the Lynchburg Procurement Code gives the City Manager the authority to move money around within a project budget as follows:

**Sec. 18.1-13. - Delegations of authority and responsibilities.**

(e) Provided that the change or claim will not cause total expenditures for a contract to exceed the amount budgeted for that contract, authority to approve changes and claims is delegated as follows:

1) The city manager may approve a change or claim that increases the amount of a contract by no more than $50,000.00.

2) The procurement administrator may approve a change or claim that increases the amount of a contract by no more than $50,000.00.

3) The city school superintendent or his designee may approve a change or claim that increases the amount of a contract for the public schools by no more than $50,000.00.

4) Any city official or employee to whom the city manager has specifically delegated authority in writing may approve a change or claim that increases the amount of a contract by no more than $50,000.00.

(f) Approval of changes or claims that increase a contract amount by more than $50,000.00 or that will cause total expenditures for a city contract to exceed the amount budgeted for that contract may only be made by the city council.
It is important to note that the thresholds for the competitive procurement processes, such as obtaining quotes or those requiring competitive sealed bids, are not changed, only the delegated authority for approving the awards and changes are delegated to the City Manager.

A substantial percentage of the contracts, subcontracts, and change orders that are currently sent to the Norwalk Common Council for approval are below $100,000. If a budget amendment is not needed, delegating authority to the Mayor to approve those awards and adjustments could significantly reduce the Council’s workload, and speed the procurement processes.

RECOMMENDATION

Recommendation 3-13:

Retain the thresholds for competitive procurements, but delegate approval authority to the Mayor for awards and changes up to $100,000, provided no budget amendment is required.

Should budget amendments be needed, regardless of the dollar amount, the Common Council should be required to make the budget amendment before the award could be approved. The Mayor should then report this information to the Common Council showing what the Mayor signed during that period.

FISCAL IMPACT

While no immediate savings could be identified, Council members and staff should experience a significant reduction in time spent overall on the smaller dollar procurements.

FINDING

Both Norwalk Public Schools and the City of Norwalk make use of blanket purchase orders for goods and services that are in high demand and will, in aggregate, exceed the threshold for competitive procure. Some of these are duplicated by NPS and the City.

A blanket purchase order is a contractual arrangement between a buyer and a supplier, for the supplier to deliver goods or services to the buyer, at a pre-set price, for a period of time. A blanket purchase order is generally used with recurring purchases from the same supplier over an extended period of time. One advantage of using blanket purchase orders is that only one solicitation is required, and departments buying of a blanket purchase order do not have to obtain quotes or go through other competitive procurement activities as the solicitation process and award have already occurred. Another advantage is that a blanket purchase order for a large number of units can trigger a volume discount from the supplier. Examples of blanket purchase orders used by the City and NPS include copiers, office supplies, and the like.

Purchasing Agents for both the City and NPS stated that they identify the goods or services that can and should be consolidated and procured under a blanket purchase order and initiate a solicitation. Recently, the two Purchasing Agents have identified some goods or services that
they both need, and are sharing responsibility for the solicitations—with one consolidating the City and NPS needs into one solicitation. One example is the blanket purchase order issued for copier. When the vendor is awarded the contract, each enters the blanket purchase order into their separate accounting systems. By consolidating the solicitation, NPS and the City can maximize their purchasing power.

Not only are some of the same vendors being used by both the City and NPS, in some instances, it appeared that different vendors may be used for similar services. In such instances, each entity is negotiating the vendor rates. By identify the general needs, combing the solicitation could result in better pricing from the most qualified vendor.

Clearly, NPS and the City have diverse needs, but when those needs overlap; collaboration on the procurement efforts could reduce the workload in each department and result in lower costs for each entity.

**RECOMMENDATION**

**Recommendation 3-14:**

*Work with the School’s Purchasing Agent to identify the joint procurement needs of NPS and the City, and to the extent possible, combine solicitations to maximize the buying power of both entities.*

**FISCAL IMPACT**

By combining solicitations to maximize buying power, the City and NPS should see a decrease in overall workload and better value for the goods and services purchased.

**FINDING**

The City applied for and obtained an Amazon Business Account to ensure that employee purchases through Amazon were exempt from sales tax.

Because the City is tax exempt, the Purchasing Guidelines instruct the users to notify the vendors so that sales tax is not charged for purchases. Employees ordering through Amazon, however, were charged sales tax automatically. The convenience and availability of goods through Amazon enticed employees to continue to use the service, meaning that the amounts charged to the employee’s assigned P-Card included a sales tax that the vendor would not remove.

To remedy this situation, the City applied for and obtain a business account which is tax exempt.

As shown in **Exhibit 3-17,** City employees still use their assigned P-Cards to make purchases, but the orders are placed through the City’s Business Account.
As a result, employees are now able to access goods through Amazon without the additional sales tax, which is saving money for the City.

**COMMENDATION**

The City has implemented a process for its employees whereby goods can be purchased online without sales tax being automatically added.

**FINDING**

The Comptroller’s Office effectively and efficiently manages the issuance and control of Procurement Cards (P-Cards) for both City and NPS employees.

P-Cards are a charge card, similar to a consumer credit card; however, the cards have built-in limits and restrictions, and the bill must be paid monthly. P-Cards reduce the processing of paperwork for small purchases, and users are able to quickly purchase what they need. According to a study done by Norwalk Public Schools, the cost to process a purchase order is approximately $75.00, therefore employees are encouraged to use the P-Card for any smaller purchases. Another industry expert estimated the cost to process a regular purchase order at $140.  P-Cards do require staff to administer and monitor the program, but the cost is estimated at less than half of the cost of processing normal purchase orders.
The City has a contract with Bank of America for P-Card services. When an employee or department has a need for a P-Card the request is approved by the department head and then forwarded to the Comptroller’s Office. Each card has a daily limit as well as a monthly limit on the amount that can be charged, and those limits are set based on need, and each card is issued in the name of the card holder.

In October 2021, 100 total P-Cards were in use; 52 were issued to NPS employees and 48 were issued to City employees. As shown in Exhibit 3-18, 63 percent of the cardholders have a standard daily limit of either $1,000 or $1,500 and a monthly limit of $5,000.

### Exhibit 3-18
P-Card Spending Controls

<table>
<thead>
<tr>
<th>Monthly Limit</th>
<th>Daily Limit</th>
<th>BOE</th>
<th>City</th>
<th>Grand Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>$5,000</td>
<td>$1,000</td>
<td>4</td>
<td>18</td>
<td>22</td>
</tr>
<tr>
<td>$5,000</td>
<td>$1,500</td>
<td>28</td>
<td>13</td>
<td>41</td>
</tr>
<tr>
<td>$10,000</td>
<td>$2,000</td>
<td>3</td>
<td>3</td>
<td>6</td>
</tr>
<tr>
<td>$7,500</td>
<td>$2,500</td>
<td>4</td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td>$10,000</td>
<td>$3,000</td>
<td>2</td>
<td>8</td>
<td>10</td>
</tr>
<tr>
<td>$10,000</td>
<td>$5,000</td>
<td>6</td>
<td>6</td>
<td>6</td>
</tr>
<tr>
<td>$20,000</td>
<td>$7,500</td>
<td></td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>$20,000</td>
<td>$10,000</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>$30,000</td>
<td>$20,000</td>
<td>7</td>
<td></td>
<td>7</td>
</tr>
<tr>
<td>$250,000</td>
<td>$100,000</td>
<td></td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td><strong>52</strong></td>
<td></td>
<td><strong>48</strong></td>
<td><strong>100</strong></td>
</tr>
</tbody>
</table>

Source: Comptroller’s Office, November 2021.

In addition to the dollar limits, the P-Card policies and procedures indicate that the cards cannot be used for:

- cash advances;
- alcoholic beverages; and
- items intended for personal use.

The two cards issued to City employees with very high limits are issued to City Finance staff and are specifically used for the payment of utility bills.

At the time that a card is issued, the employee comes to the Comptroller’s Office to retrieve the card and signs to acknowledge receipt of the card. At that same time, the employee signs the P-Card Employee Agreement and receives a copy of the P-Card policies. In addition, the employee is scheduled for training where they are given information on the process for making and validating purchases in the Bank of America Online and given access to the system. Following the training, the employee may begin using the P-Card.

The process for requesting and issuing a P-Card is shown in Exhibit 3-19.

**COMMENDATION**

P-Cards are an efficient way to handle small purchases, and the City has strong controls in place for approving and issuing new P-Cards and controlling the P-Card use within the daily and monthly limits.
Exhibit 3-19
P-Card Spending Controls

City Requesting and Issuing Purchasing Cards

Bank of America/Card Issuer

All cards are issued in the users name and the card holder is responsible for following procedures for verifying purchases providing required documentation and the like.

Request for card is processed and card is issued

Department

Employee requests card → Request Form to Department Head

Dept. Head Approved?

Yes → STOP

Will standard limits apply?

No → Dept. Head recommends higher/different limits

Employee signs to acknowledge receipt of the card and signs the P-Card Employee Agreement → Employee begins using the P-Card

Comptroller

Comptroller reviews request for higher limits

Comptroller approves

Yes → Request for Card Received

Approved?

Yes → Comptroller receives card, records receipt and delivers card to the employee

Employee is given copies of P-Card policy, schedule for training and given access to the BOA Online System

No → Standard Limits Apply

STOP

Yes → Request Processed and Sent to Issuer

No → Request for Card Received

Approved?

Yes →

No → STOP

Source: Compiled by Evergreen through document review and interviews, December 2021.
FINDING

Allowing P-Card purchases for items requiring competitive procurement places the City at risk of violating purchasing policy and grossly over-spending budgets.

Exhibit 3-20 illustrates the process used by the City employees.

Although the controls and reconciliation processes for the P-Cards are good, none of the purchases made with P-Cards, regardless of the dollar amount, are entered as requisitions into MUNIS—meaning the anticipated cost of the goods or services are not encumbered. Nor is any prior approval of the purchase required. As discussed, P-Cards are an efficient way to process small purchases, primarily due to the cost of processing individual purchase orders and payments to each vendor. When individual purchases or aggregate purchases of goods or services exceed the competitive procurement thresholds are made with P-Cards, risk of violating policy or overspending budgets increases.

Although the procedures require the purchasers to follow all bidding and quote requirements based on the dollar amount of the purchase, validation that such competitive procurement requirements have been met is not obtained until the BOA bill is reconciled each month.

In some organizations, there is a requirement for purchases exceeding a specified dollar amount, a P-Card may be used, but a purchase order must be approved in advance indicating that there is money in the budget to cover the expense and to ensure that all competitive procurement procedures have been followed. If there is a blanket purchase order on file for the goods or services, or if the purchases are made through a state or local cooperative agreement, no purchase order is required in advance. The intent of these requirements is not to restrict or slow down the purchasing process, but to ensure that individuals who use P-Cards are adhering to policy and budgetary constraints.

RECOMMENDATION

Recommendation 3-15:

Require requisitions to be entered in advance of P-Card purchases over $10,000.

Policy prohibits the splitting of purchases to avoid the need for competitive procurements, and that provision should apply to the use of P-Cards.

FISCAL IMPACT

This recommendation can be implemented with existing resources.
Exhibit 3-20
Process for Use and Reconciliation of P-Card Purchases

City Use and Reconciliation of P-Card Purchases

Source: Compiled by Evergreen through document review and interviews, December 2021.
3.7 **ACCOUNTS PAYABLE**

The City Comptroller’s Office is responsible for issuing all payments—whether checks, direct deposits or wire transfers—for the entire City, including Norwalk Public Schools. Consequently, all invoices resulting from a purchase of goods or services are funneled to the Comptroller for payment.

**Exhibit 3-21** illustrates the process for receiving goods, reconciling invoices, and ultimately paying the vendor.
Exhibit 3-21
Receiving and Accounts Payable Processes

Source: Compiled by Evergreen through document review and interviews, December 2021.
FINDING

The process for setting up vendors in the MUNIS system is manual and controls do not exist that would prevent malfeasance and minimum vendor requirements are not enforced.

The following excerpt from the External Audit documentation that explains the issue:

New vendors can be added by personnel in the Purchasing Department and Comptroller’s Office. Nobody outside those two offices can add new vendors. Before adding a vendor, the responsible individual must verify that the vendor is not already on file and that the vendor has completed a W-9. There is no specific review process over new vendors outside of obtaining a W-9 and no specific approval required. Once an individual in the Purchasing Dept or Comptroller’ Office enters the new vendor, there is no additional review by another personnel. Any department head may request that a vendor be added. There is no process in place to review a vendor listing periodically for potentially fictitious or unauthorized vendors.

Norwalk Public Schools had a MUNIS assessment conducted in August 2021, and one of the recommendations was to activate the self-help module for vendors, so the vendors become responsible for keeping their information current.

The City of New Haven has implemented a similar system, as shown in Exhibit 3-22.

Implementing a system like this with embedded minimum requirements for becoming a vendor could provide controls designed to reduce the likelihood of malfeasance and generally reduce the workloads for both the Purchasing and Comptroller staff.

Having a third party in Finance responsible for the review and approval of vendors and the removal of inactive vendors would further ensure a separation of duties between the staff that set up vendors and those that later pay them,

RECOMMENDATION

Recommendation 3-16:

Establish the requirements for an individual or company to become an authorized vendor for the City or NPS, and activate the MUNIS module for vendors to apply online.

FISCAL IMPACT

The cost for implementing this system in MUNIS is not known at this time due to the fact that a MUNIS upgrade will be implemented in April 2022, which could contain this functionality at little or no cost to the City. The reduction in workload and the internal control improvements; however, should significantly improve the efficiency of the vendor set up and maintenance processes.
The City of New Haven has implemented a new feature to its Purchasing and Fiscal management system. This system will dramatically improve the manner in which the City of New Haven does business. One of the outstanding features of this new system is Vendor Self-Service, which is a free, online vendor information management system. This system/website will allow you to update your information in our financial database in order to ensure the accuracy of your company's information and to support timely payment of invoices. Vendor Self-Service is available 24 hours per day, 7 days per week, and 365 days per year. This is in addition to your procurement registration.

Please be aware, vendors that do not register and verify their information, including uploading a W-9 form to their profile, may experience delays in the processing of invoices.

After Clicking the Register Button above:
You will see the Vendor Self-Serve Page on the City website. Click "Registration." in the right-side menu

**Step 1 of 5** will appear for you to enter your firm's information. You must include your firm's Federal Identification or Social Security number to begin.

**Step 1** - Create a user ID and password. Your User ID can be between 1 and 20 characters and should be something you will remember. Your Password should contain a combination of letters and numbers, not to exceed 15 characters. Enter the security numbers and click "Continue."

**Step 2** - Add your firm's information. If you want purchase orders delivered by e-mail, insert the e-mail address you want used in this step, then click "Continue."

**Step 3** - Verify or add your remittance information. You will be required to list an e-mail address. Click "Continue."

**Step 4** - Add your contact information and select your preferred method for receiving purchase orders. Select only one option. Please note that at this time the City of New Haven will NOT be using the fax method of delivery. Click "Continue."

**Step 5** - Review and verify all your information. Read and accept the Important Notice and click "Register" at the bottom of the page and your information will be delivered to the City of New Haven for review.

**Please note that in order to do business with the City of New Haven you MUST upload a current W-9 form by clicking "Upload attachment documents to your profile" after you have completed the registration. This is also where you would upload any additional documents, such as, disclosure forms, local compliance document, certifications and insurance certificates.**


**FINDING**

Although the MUNIS system is capable of accepting scanned copies of supporting documentation for each requisition and purchase order, Comptroller staff require purchasers to physically send paper copies of receiving documents and invoices for final approval to pay.

When processed, Comptroller staff physically scan all of the documentation into MUNIS. If the documentation is insufficient, the paper packet is sent back to the purchaser for correction. The process of moving paper to and from the purchaser can add days to the process. Some of the
user divisions said that they get the packet back and in some cases do not understand what is missing. When this happens, they call the Accounts Payable staff to determine what they need to do to correct the documentation.

The Comptroller pays invoices for Norwalk Schools and the City. NPS purchasers create electronic copies of all of the documents and send the files to the School’s Purchasing Department for processing. Purchasing prints off copies of the electronic files and sends the hard copies to the Comptroller for processing.

One of the recommendations made by Tyler Technology in an assessment done on behalf of NPS, addressed this situation:

**Accounts Payable- Electronic Approval**

**Observation:** Currently all invoices for the BOE are sent to the City of Norwalk for entry in Munis.

**Recommendation:** Tyler recommends the BOE perform the data entry of invoices and then release into an approval process. Attach invoice and/or required documentation via Tyler Content Manager (TCM). Create API workflow business rules to route the invoices for approval electronically. There are numerous ways to define the business rules so that all parties can approve the invoice before payment is made to the vendor.

**Benefits:** The invoices will be entered into Munis and the invoice copy will be scanned in Tyler Content Manager. The invoices will no longer be shuffled from one location to another. All documentation will reside in Munis and can be viewed by appropriate resources.

**Implementation:** Training (1-2 days)

**Impact/Effort: Worthwhile Investment**

**Impact on City:** Invoices will no longer need to be sent over to the City offices. BOE staff enter invoices and release for approval, allowing both BOE staff and City to approve. The City does not need to create workflow approval for their own invoices should they choose to have them approve automatically.

The Comptroller’s staff have the ability to view the scanned documentation that is loaded to MUNIS. If the electronic documentation is insufficient, the request to pay can be rejected and a reason for the rejection can be entered. The user is notified of the rejection electronically, and once the corrections are made, the user can resend the request for payment back to the Comptroller for processing.

**RECOMMENDATION**

**Recommendation 3-17:**

Require all City and NPS receiving departments to scan all supporting and receiving documents into MUNIS and use the system to record the Comptroller’s rejections or approvals for payment.
While training of the Comptroller staff and the users will be necessary, eliminating the physical movement of paper could potentially cut several days off the processing time and expedite payments vendors.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources. Savings as a result of implementing this recommendation are included with the following recommendation.

**FINDING**

Comptroller staff process and cut checks to vendors daily, which is inefficient and could lead to multiple checks be cut to the same vendor within a matter of days.

Accounts Payable staff batch payments for processing and issue checks to vendors every day. The reasoning behind this process is that requests for payment are often already late at the time they receive the request for payment and vendors are expecting to be paid as quickly as possible. Secondly, staff said that processing only once a week or once every two weeks would make the check runs very large and would be difficult to complete in a single day.

The primary measures of efficiency and effectiveness in terms of Accounts Payable include:

- maximizing interest earned – paying the bills as near the due date as possible so the City’s cash can earn the maximum amount of interest;
- minimizing penalties or interest on bills owed while maximizing any available prompt payment discounts by paying timely;
- maintaining a good credit rating by implementing processes that reduce the likelihood of overdue payments; and
- minimizing the amount of staff accounting and processing time and resources.

A less frequent payment schedule would allow the City to hold its money in the bank for additional days without impacting credit ratings, penalties or prompt payment discounts. A less frequent payment schedule should also reduce the cumulative number of payments processed by reducing redundancies associated with daily payment processing and accounting entries.

**RECOMMENDATION**

**Recommendation 3-18:**

Process bi-weekly Accounts Payable checks.

A schedule of cutoff dates and payment dates should be published and shared with departments and vendors. When possible, Accounts Payable check runs should be processed during a week when Payroll is not being processed—to even out the workload for the Department.
FISCAL IMPACT

Once the Accounts Payable schedule is established and running effectively and users are scanning and sending receiving documents electronically, rather than sending hard copies to the Comptroller, it should be possible to eliminate an Accounting Clerk II position at an average annual salary of $70,000 plus benefits of 69.89 percent for a total of $118,923 ($70,000 + $49,929).

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process Accounts Payable Checks Once Every Two Weeks</td>
<td>$118,923</td>
<td>$118,923</td>
<td>$118,923</td>
<td>$118,923</td>
<td>$118,923</td>
</tr>
</tbody>
</table>

3.8 POLICIES AND PROCEDURES

Policies and procedures allow an employer to commit to writing an organization’s values and mission. They also set standards of behavior, conduct and performance for employees. As a result, policies and procedures clearly define and set the expectations for employees and provide a source of reference for employees to be able to review and check if they are meeting those expectations.

Policies and procedures let employees know where they can turn to for help. All policies should have a point of contact for queries relating to that policy so employees know who they can contact for questions. Further, policies and procedures will set out the processes and options available for how job duties can be performed in the workplace.

FINDING

The City has some documented policies and procedures which include internal control documents, process flowcharts, and specific desk procedures. They have also made available training guides for the departments to know how to use MUNIS. However, there is no comprehensive Procedures Manual, online or in hard copy. Procedures provide guidance for daily operations and help ensure an efficient and effective workflow. A comprehensive Financial Procedures Manual, online and/or hard copy is vital to smooth and consistent operations.

Exhibit 3-23 below provides a listing of the current policies and procedures for the City.
Exhibit 3-23
Listing of Policies and Procedures

<table>
<thead>
<tr>
<th>Description</th>
<th>Date last updated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Control Documentation-Capital Assets</td>
<td>6/30/21</td>
</tr>
<tr>
<td>Control Documentation-Cash</td>
<td>6/30/21</td>
</tr>
<tr>
<td>Control Documentation-Debt and debt service</td>
<td>6/30/21</td>
</tr>
<tr>
<td>Control Documentation-Expenditures AP and Budget</td>
<td>6/30/21</td>
</tr>
<tr>
<td>Control Documentation-Grant revenue</td>
<td>6/30/21</td>
</tr>
<tr>
<td>Control Documentation-Investments</td>
<td>6/30/21</td>
</tr>
<tr>
<td>Control Documentation-Payroll and related liabilities</td>
<td>6/30/21</td>
</tr>
<tr>
<td>Year End Closing Requirements</td>
<td>6/18/21</td>
</tr>
<tr>
<td>MUNIS Purchasing department codes</td>
<td>NA</td>
</tr>
<tr>
<td>Purchasing Guidelines</td>
<td>NA</td>
</tr>
<tr>
<td>Purchasing Bid Process</td>
<td>NA</td>
</tr>
</tbody>
</table>

Source: City of Norwalk Finance Staff

RECOMMENDATION

Recommendation 3-19:


A Procedures Manual is a consolidation of updated guidelines and previously issued documents designed to provide a comprehensive presentation of standardized procedures that are mandated by state law, Board policy, administrative directives and/or good business practices. Compliance with these provisions is mandatory for all local, state, and federal funds processed through the finance department regardless of their source.

Conformation with these guidelines will allow prompt and accurate conducting of City business affairs in a responsive and progressive manner. Department heads should inform their staff so that they are aware of the guidelines that may pertain to their particular area. An online format would allow for easier access and updates made more readily when needed.

FISCAL IMPACT

This recommendation can be implemented with existing resources.
CHAPTER 4:
HUMAN RESOURCES
4.0 HUMAN RESOURCES

This chapter reviews the human resources functions of the City of Norwalk and is divided into the following six sections:

4.1 Organization and Management
4.2 Personnel Policies and Procedures
4.3 Pension and Benefits
4.4 Recruitment, Hiring, and Retention
4.5 Labor Relations
4.6 Performance Evaluation

Personnel make up a significant portion of a municipal government’s budget and the management and support of its staff is a critical function.

4.1 ORGANIZATION AND MANAGEMENT

The Personnel and Labor Relations Department is overseen by the Chief of Human Resources and Personnel. As shown in Exhibit 4-1, this position is appointed by the Mayor and reports up through the Chief of Staff to the Mayor. A total of five employees report to the Chief.

Exhibit 4-1
Personnel and Labor Relations Organization

In December, the current Chief announced his intent to retire at the end of December 2021, but agreed to continue in the position on a part-time or consulting basis until his replacement is named.
The stated mission of the Personnel and Labor Relations Department is to:

- administer the city's compensation plans and employee benefit programs;
- assist departments in recruiting, selecting, and training new employees;
- conduct analyses of job classifications;
- conduct periodic employee training and safety programs;
- maintain employee records;
- provide personnel and labor relations services to all City departments; and
- represent the city's interest in collective bargaining, grievance, and arbitration matters.

Exhibit 4-2 provides a summary of the number of full-time employees by functions over the last ten years.

### Exhibit 4-2

**Full Time Equivalent Employee Trends**

**Fiscal 12 through 21**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>General Government</td>
<td>47</td>
<td>47</td>
<td>47</td>
<td>47</td>
<td>48</td>
<td>50</td>
<td>52</td>
<td>52</td>
<td>68</td>
<td>59</td>
<td>25.5%</td>
</tr>
<tr>
<td>Finance</td>
<td>34</td>
<td>35</td>
<td>35</td>
<td>34</td>
<td>34</td>
<td>36</td>
<td>35</td>
<td>35</td>
<td>35</td>
<td>35</td>
<td>2.9%</td>
</tr>
<tr>
<td>Health &amp; Welfare</td>
<td>16</td>
<td>16</td>
<td>16</td>
<td>16</td>
<td>16</td>
<td>16</td>
<td>16</td>
<td>16</td>
<td>23</td>
<td>23</td>
<td>43.8%</td>
</tr>
<tr>
<td>Police</td>
<td>197</td>
<td>197</td>
<td>197</td>
<td>197</td>
<td>197</td>
<td>197</td>
<td>196</td>
<td>196</td>
<td>176</td>
<td>178</td>
<td>-9.6%</td>
</tr>
<tr>
<td>Fire</td>
<td>146</td>
<td>145</td>
<td>147</td>
<td>147</td>
<td>147</td>
<td>147</td>
<td>147</td>
<td>147</td>
<td>136</td>
<td>139</td>
<td>-4.8%</td>
</tr>
<tr>
<td>Other Protection</td>
<td>43</td>
<td>43</td>
<td>43</td>
<td>43</td>
<td>43</td>
<td>43</td>
<td>43</td>
<td>43</td>
<td>45</td>
<td>45</td>
<td>0.0%</td>
</tr>
<tr>
<td>Public Works and Traffic</td>
<td>114</td>
<td>102</td>
<td>103</td>
<td>103</td>
<td>104</td>
<td>104</td>
<td>105</td>
<td>104</td>
<td>95</td>
<td>95</td>
<td>-16.7%</td>
</tr>
<tr>
<td>Education</td>
<td>1,310</td>
<td>1,236</td>
<td>1,259</td>
<td>1,163</td>
<td>1,191</td>
<td>1,166</td>
<td>1,209</td>
<td>1,228</td>
<td>1,228</td>
<td>1,409</td>
<td>7.6%</td>
</tr>
<tr>
<td>Recreation, Arts &amp; Culture</td>
<td>51</td>
<td>49</td>
<td>50</td>
<td>49</td>
<td>50</td>
<td>50</td>
<td>50</td>
<td>50</td>
<td>55</td>
<td>55</td>
<td>7.8%</td>
</tr>
<tr>
<td><strong>Total Employees</strong></td>
<td>1,958</td>
<td>1,870</td>
<td>1,897</td>
<td>1,799</td>
<td>1,830</td>
<td>1,809</td>
<td>1,854</td>
<td>1,874</td>
<td>1,859</td>
<td>2,036</td>
<td>4.0%</td>
</tr>
<tr>
<td><strong>City Employees Only</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>-3.2%</td>
</tr>
<tr>
<td><strong>City of Norwalk Population</strong></td>
<td>86,460</td>
<td>87,190</td>
<td>87,776</td>
<td>88,145</td>
<td>88,485</td>
<td>88,438</td>
<td>89,005</td>
<td>89,937</td>
<td>88,436</td>
<td>88,816</td>
<td>2.7%</td>
</tr>
</tbody>
</table>

*Source: 2021 Comprehensive Annual Financial Report, Table 17, Budget Full-Time Employees – Unaudited*

As can be seen, the total number of employees working for the City, including the schools, has increased by 4.0 percent over the last ten years—during a period when the overall City population increased by 2.7 percent. City-only employee numbers increased gradually through 2019, at which time the City offered employees an early retirement incentive; 44 individuals took that incentive. Some of those positions were refilled; however, some vacant positions were eliminated, resulting in an overall decrease in total City employees of 3.2 percent for the 10-year period.
FINDING

As shown in the organization chart above, there are a total of six positions in the Human Resources and Personnel Department, including the Chief, which is slightly below industry standards for HR staff to active employees, it does not consider the 1,160 retirees that are also a major part of the departments overall workload.

According to the 2018 HR Benchmarks Report published by Bloomberg Law in June 2018, “HR departments have a median of 1.5 employees for every 100 in the workforce, which represents an all-time high in the survey’s 40-year history.” For decades, the ratio seemed to be in a holding pattern at 1.0 to 100.

With six positions and an average of 640 FTE active employees, the staff to HR employee ratio in the City of Norwalk is 106.7 staff to every one HR position, or .94 Human Resources employees for every 100 FTE employees. Adding in the 637 City retirees (including Fire and Police) and the 293 Board of Education retirees, the total individuals served by the Department is approximately 1,500—meaning the staff to HR employee ratio is 1 to 250, or .40 HR positions for every 100 positions served.

While retirees may not require the same level of support as active employees, retirees are eligible for health, dental and life insurance coverages that differ somewhat from those offered to active employees. HR staff must still maintain the coverage records, process open enrollment changes twice a year, make changes based on life events, and the like. The Benefits Manager also maintains pension payment information in MUNIS—including cost of living increases, payroll deductions for taxes, employee contributions for medical coverages, and domestic relations orders. The Benefits Manager also performs many of the same duties as are required for an active employee.

Retirees vested in the plan prior to July 2012 receive a regular pension check based on their years of service and the various elections made by the employee at the time of retirement. Retirees receiving pension checks are also eligible for cost of living increases that must be entered manually, have payroll deductions that change from time to time, and frequently call or come by the department to ask questions and obtain clarification on a host of issues. At this time, the Benefit Manager primarily deals with the retirement and pension benefits, assists employees during the retirement process, and provides calculations and recommendations to the Pension Review Board on a regular basis.

The two HR Generalists respond to questions from active employees as well as retirees and assist in onboarding new employees, including assisting them to sign up for insurance benefits, and making changes to insurance coverages. At this time, the HR Generalists are working remotely on alternating days, with all in the office on Wednesdays. On the days they are working in the office, their primary duty is answering the phones and addressing the needs of walk-in applicants, employees and retirees. They indicated that the days they work remotely are more productive as they do not have the interruptions from the phone and counter traffic.

In 2019, Evergreen conducted a survey of 120 local governments. Exhibit 4-3 provides the average staffing levels for organizations with between 500 and 1000 employees.
Exhibit 4-3
Average Human Resource Staffing Levels
Local Governments with 500-1000 Employees

<table>
<thead>
<tr>
<th>Staffing</th>
<th>Peer Average</th>
</tr>
</thead>
<tbody>
<tr>
<td>HR Department</td>
<td>7.85</td>
</tr>
<tr>
<td>HR Leadership</td>
<td>1.85</td>
</tr>
<tr>
<td>HR Generalists</td>
<td>3.56</td>
</tr>
</tbody>
</table>

Source: Evergreen Solutions, LLC 2019.

Considering the workload for active and retired employees, the staffing ratios in the Norwalk City Human Resources and Personnel Department fall well below industry standards and local government averages.

RECOMMENDATION

Recommendation 4-1:

Hire an additional HR Generalist to provide the level of staff support needed for an organization that serves both active and retired employees.

Rather than subdividing the workload along the current lines, some portion of the new position could be used to assist in the onboarding process for new employees and assist with some of the benefit related activities. In addition, recommendations in Chapter 3 - Financial Management require Human Resources to assume greater responsibility in entering and maintaining employee data in MUNIS, which this position could potentially handle.

FISCAL IMPACT

The current HR Generalists make an average of $80,000 annually meaning the total cost for implementing this recommendation would be $135,912 including benefits of 69.89 percent.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hire an HR Generalist</td>
<td>($135,912)</td>
<td>($135,912)</td>
<td>($135,912)</td>
<td>($135,912)</td>
<td>($135,912)</td>
</tr>
</tbody>
</table>

4.2 Personnel Policies and Procedures

Personnel Policies and Procedures provide the employees in an organization basic information regarding the employer’s expectations and general guidance on various topics. Many of the policies and procedures normally found in an employee handbook or policy manual are found in the bargaining agreements in a heavily unionized organization such as the City of Norwalk. Within those bargaining agreements, there are variances in the processes for filing a grievance, the amount and type of leave, and the availability of benefits for the employee and their families.

There are, however, non-affiliated employees who need guidance and there are common laws, policies, practices and procedures that pertain to all employees such as sexual harassment and equal opportunity laws.
FINDING

The City’s Personnel Policies and Procedures and the Employee Handbook are difficult to locate on the City website. In fact, some have not been reviewed or modified in a number of years.

According to staff, at the time that an employee is hired, they are given a packet containing copies of City policies and procedures. One packet is for part-time employees and the other is for full-time employees. In reviewing the packets, Evergreen found there was no index showing the topics covered in the packet, and the electronic version that was provided to the Evergreen Team was not fully searchable. Each packet appears to contain copies of the policies found online. As shown in Exhibit 4-4, the policies listed on that site are generally those that would normally be found in an employee handbook. The packet for the part-time employees did not contain policies relating to areas that would only apply to full-time employees. The policy on Harassment in the Work Place, however, would apply and was not included in the part-time packet.

Exhibit 4-4
Policy Statements from the Website

<table>
<thead>
<tr>
<th>Policies</th>
</tr>
</thead>
<tbody>
<tr>
<td>Statements</td>
</tr>
<tr>
<td>The following are employment policy statements enacted by Norwalk to ensure that the city is a pleasant, safe, and equitable place to work:</td>
</tr>
<tr>
<td>• Affirmative Action/Equal Opportunity</td>
</tr>
<tr>
<td>• Drug-Free Workplace</td>
</tr>
<tr>
<td>• Family Medical Leave Act (FMLA)</td>
</tr>
<tr>
<td>• Harassment in the Workplace</td>
</tr>
<tr>
<td>• HIPAA Privacy Notice</td>
</tr>
<tr>
<td>• Cash Handling</td>
</tr>
<tr>
<td>• Public Records Policy: Disposition of Public Records</td>
</tr>
<tr>
<td>• Norwalk Code of Ethics</td>
</tr>
<tr>
<td>• Smoking in Municipal Buildings</td>
</tr>
<tr>
<td>• Zero Tolerance Workplace Violence</td>
</tr>
<tr>
<td>• Mobile Device Security &amp; Bring Your Own Device</td>
</tr>
<tr>
<td>• Password Protection</td>
</tr>
<tr>
<td>• Remote Access</td>
</tr>
<tr>
<td>• Social Media Use</td>
</tr>
<tr>
<td>• Technology Acceptable Use</td>
</tr>
</tbody>
</table>

For More Information
For more information about the City of Norwalk’s employment policies, please contact the Personnel and Labor Relations Department at (203) 854-7864/7716.


In addition, on the website under Active Employees is a document referred to as Personnel Policies and Regulations. The actual document is untitled, but this 11-page document has have been approved by the Personnel Committee of the common Council on October 11, 1979, and then approved by Common Council as Amended on October 23, 1979, November 13, 1979, and finally on October 23, 1990.
The document contains an index and addresses the following 17 topics:

I. Definitions
II. Recruitment
III. Examinations
IV. Hiring Procedures
V. Appointments
VI. Probationary Period
VII. Salaries, Wages and Benefits
VIII. Conduct of Employees
IX. Work Rules
X. Penalties
XI. Separations
XII. Transfers, Promotions, Assignment Changes
XIII. Grievance Procedure
XIV. Records
XV. Department Regulations
XVI. Severability
XVII. Common Council Resolution on Fringe Benefits

Although this document has not been amended in many years, the generic statement contained herein appears to be relevant. Throughout the document, reference is made to the bargaining agreements as taking precedent for members, and primarily addresses rules for employees not covered by a bargaining unit.

To determine which standards and rules apply to each bargaining unit, bargaining agreements were reviewed and found to have some consistency in the handling of grievance, for example. In some, but not all of the union contracts, a reference is made to City policies; however, it is not always clear as to which of the policies apply.

Most of the documents reviewed are in a legal format with very few links to the forms they will need to complete or how they will proceed in handling a specific situation. Under the Active Employee Section of the HR website, the Family Medical Leave Act (FMLA) not only contains a copy of the policy, but most of the forms an employee will need to apply for FMLA.

Topics addressed piecemeal on the website that may be valuable for new hires is information regarding accommodation through the Americans with Disabilities Act, timekeeping and leave reporting, reporting of workplace injuries, and the like.

For a new or tenured employee to navigate the system to find information on a specific topic, however, is difficult and time consuming. According to staff, most resort to calling the department to obtain the information. Having an organized, searchable document that provides employees quick reference to topics and hyperlinks to the associated documents (like the bargaining agreements and associated forms) could reduce the amount of time that staff spend answering questions and would give employees fingertip access to information on a host of topics.
RECOMMENDATION

Recommendation 4-2:

Consolidate all employee-related policies, procedures and documentation into a single, indexed and searchable Employee Handbook.

Updating the policies, adding relevant topics and references, and who to contact with questions can benefit both full- and part-time employees, making the need for a separate document for part-time employees unnecessary as the Handbook could state when a section does not apply to an employee group. Some policy and procedural matters may require the review/approval of the bargaining units and/or Common Council.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

Temporary part-time seasonal employees are not routinely removed from the payroll system or shown as terminated in the system, which causes some difficulty for HR staff when processing unemployment applications.

When the HR Generalists receive an unemployment application claim, they have 10 days in which to respond. The first step is to access MUNIS to identify the employee and determine whether they have actually been terminated. If the employee is still an active employee, they have to report that information. All election workers and seasonal employees are eligible to apply for unemployment compensation on the day after the job ends. Since the seasonal or temporary workers are not removed from the system, they are required to verify with the supervisor that the employee has completed his/her work and on what day the job ended.

A review of the City employee payroll files showed that 1,316 part-time temporary employees were included in the file. Managers do not want the employee files purged, as they use many of the same individuals each year and are able to bring them back each year without the need for additional new hire paperwork. Some of these individuals, however, have not been used for many years and HR staff have been trying to clean up the files and terminate those that are no longer active.

RECOMMENDATION

Recommendation 4-3:

Regularly terminate any temporary part-time employees in the payroll system who have not received a paycheck within the last 18 months.

Cleaning up the system in this way will allow the Manager to still bring temporary employees back each year without additional paperwork, but once an employee is not used for 18 months, the system should be purged. Further, HR needs to work with the Comptroller’s Office to devise...
a way for managers to enter a job end date into the system to eliminate the need for HR staff to manually search for this information. The City has created a joint committee with the BOE to review possible MUNIS enhancement in advance of the September 2022 planned MUNIS update. Evaluating the system capabilities during this process could result in an automated way to facilitate this activity.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

Many City staff and managers are working remotely for all or part of the work week; however, the City does not have a documented policy or employee agreement form relating to working remotely.

Prior to COVID, very few employees worked remotely and each request to work remotely for even a portion of the work week was managed by the department head on a case-by-case basis. Since COVID, the practice became the norm rather than the exception. Still, the City has not established guidelines for working remotely. During interviews, employees gave a number of reasons for working remotely with some indicating that they are providing home care for a family member or prefer to work remotely, so they are not interrupted by phone calls and walk in traffic.

Attempts to call employees on their office phones on days when they were known to be working remotely resulted in instances where phones were not forwarded to a team member or receptionist, there was no message giving a different number at which they could be reached and/or answering machines that were full and would not accept additional messages.

In reality, remote working environments should emulate the office environment, with established work schedules (including lunch and other break times) and electronic access to systems, to office phones, and to fellow employees and customers, in much the same way as they would have if working in the office. For the public calling in for assistance, the fact that an employee is working out of the city should be invisible.

In addition, even though the employee is working in a remote location, they remain an employee on duty for the City. Consequently, the remote location is considered an official City worksite for purposes of Workers’ Compensation, which means that the City could be liable for accidents or injury in that environment.

Montgomery County, Maryland, has a comprehensive Telework Packet that outlines the standards of conduct and establishes the safety for the Remote Work Location and contains agreement forms that acknowledge the rules of conduct certify that the workplace is safe and differentiates between the equipment that will provided by the County and what the employee agrees to provide.

Exhibit 4-5 provides an excerpts from the Montgomery County Telework Packet.
Exhibit 4-5
Excerpts from the Montgomery County Telework Packet

Terms and Conditions

Work Schedules, Attendance, and Hours of Work – Time spent in a Teleworking status must be accounted for in the same manner as if the Teleworker reported for work at the main worksite. The employee’s time should be recorded in MCtime using the Reason Code designated for Telework. Unless authorized by your supervisor, you must maintain your approved schedule. Notifications of sick leave and requests for annual leave should comply with current departmental procedures. You may not work overtime from the Remote Work Location (RWL) without prior approval from your supervisor. Employees who work overtime without prior approval may be subject to disciplinary action. In the event the County is closed due to weather or another emergency, you will not be required to Telework.

Training – You are required to attend the Telework Training for Participants before beginning Telework. An employee will not be permitted to Telework without completing the required training and assessment.

Work space – Your RWL is considered an extension of the County’s work space. You are responsible for ensuring that a proper work environment is maintained at all times. Telework is not a substitute for child/adult day care. You cannot operate a business or work for another employer during the approved work hours. Use of County equipment or access to the County’s organization network by others is prohibited. An employee that works from a RWL more than half the time may be required to utilize an alternative County worksite or share office space at the Main Worksite. You are prohibited from conducting in-person meetings with customers or co-workers at your home residence. You could be required to attend meetings in person at a County facility or make alternative arrangements.

Worksite Safety You affirm that you have a suitable place to work at the RWL and that to the best of your knowledge the RWL is safe from conditions that could pose a hazard to health and safety or danger to yourself or any County equipment. You must allow visits by a County representative as determined by your supervisor. Visits may be conducted to install, maintain, or inspect equipment, or to inspect the RWL for suitability and safety. Reasonable advance notice will be given unless you agree to shorter notice. You are required to complete and attach the Safety Information sheet to this Agreement.

Liability and Injury Compensation
The RWL is considered an official County worksite for purposes of Worker’s Compensation. You agree to notify your supervisor immediately of any accident or injury that occurs at the Remove Work Location while performing official duties. Worker’s Compensation does not cover accidents to family members or other third parties at the RWL.

Standards of Conduct
The Teleworker acknowledges that he/she continues to be bound by the County’s standard of conduct while working at the RWL.

Termination
This Telework Agreement is not a guarantee of employment, and can be terminated at any time by either the County or the Teleworker.


Telework, without clearly stated guidelines and acknowledgements, places the City at risk of liabilities and, in some instances, could result in a loss of employee productivity.

Another emerging issue for employers that allow telework is equity and fairness as to which positions are eligible for telework and which are not. Challenges over equity in the workplace surrounding make it even more important for employers to have published guidelines.
RECOMMENDATION

Recommendation 4-4:

Establish a policy outlining the requirements and conditions for working remotely, and have employees sign an agreement acknowledging the requirements.

Working remotely should require the approval of a senior-level management position. Department heads should have the option of reevaluating whether the current employees should be allowed to continue working remotely, considering the new guidelines and whether the remote working arrangement is appropriate for the job duties assigned. Any employees who are approved to continue working remotely should be required to sign the Remote Working Agreement.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

4.3 PENSION AND BENEFITS

The City administers a wide array of benefits for all City employees, including some employees of Norwalk Public Schools. Benefits are listed below:

Medical and Related Insurance Coverages

The City offers a Point of Service (POS) medical health plan for its employees provided through the Anthem Connecticut Partnership Plan, and the amount of employee contributions to the plan are set in the individual bargaining agreements. Under the same CT Partnership program Dental and Vision coverage is provided through CIGNA Healthcare and Pharmacy Coverage is provided through CVS/Caremark. Police and Fire employees are covered under this same plan.

Employees are also provided employer-paid life insurance coverage according to the provisions found in the bargaining agreements.

The City, in partnership with MetLife, offers several voluntary benefit programs:

- **Supplemental Life and Accidental Death and Dismemberment (for Employees and Dependents)**
  - Municipal Employees can purchase term life insurance with accidental death and dismemberment in $10,000 increments to a maximum of the lesser of 5 times their pay or $500,000. Minimum benefit is $10,000 and the there are no medical questions asked for coverage $100,000 and below
  - Firefighters and Police Officers can purchase coverage in $10,000 increments to a maximum of the lesser of 5 times their pay or $500,000. Minimum benefit is
$10,000 and the there are no medical questions asked for coverage $100,000 and below

- **Spouse** coverage may be purchased in $5,00 increments to a maximum of $100,000, not to exceed 50 percent of the employee’s optional life benefit

- Child coverage may be purchased in options of $1,000, $2,000, $4,000, $5,000 or $10,000 (not to exceed the spouse benefit amount). NOTE: children 15 days to 6 months old are only eligible for $1,000.

- **Voluntary Long-Term Disability** - This is offered at 60 percent of pre-disability earnings with a maximum monthly benefit of $6,000.

- **Whole Life Insurance** - Whole Life Insurance is a policy that is owned by the employee; it can never be cancelled, even if their health changes and the employee can purchase additional coverage to supplement other life insurance coverages.

- **Group Accident** - Employees have the option to purchase the high plan or the low plan, on a guaranteed issue basis (meaning no medical questions asked). This coverage is designed to provide (to the insured person) coverage for certain losses resulting from an accident only (does not provide reimbursement of medical expenses and does not replace medical insurance).

**Retirement and Pension Benefits** - All City regular, full-time paid employees, including BOE employees other than teachers, who were employed prior to 2012 and work more than 1,200 hours (1,100 hours for 10-month BOE employees) per year were eligible to participate in the City of Norwalk Pension Plan, and retirees are provided benefits through that plan. Employees hired after 2012 are automatically enrolled a 401a plan discussed below,

The Norwalk City Employees’ Pension Plan is governed by the City of Norwalk Pension Board which is made up of:

(a) a public member, who shall be the Chairman of the Pension Board, appointed by the Mayor of the City;
(b) five (5) public members appointed by the Mayor of the City;
(c) the City’s Director of Finance or his/her designee; and
(d) five (5) Members (as defined in Section 1.17) designated by the Coalition of unions representing Members.

Employee payroll deductions for retirement and the City and/or BOE contributions on behalf of the employee are deposited to their account in the Fiduciary Fund managed by the Pension Board. The Board is responsible for ensuring that prudent investments are made, and the fund remains solvent based on actuarial calculations. Callen is the firm that serves the Pension Board as an investment advisor.

Prior to July 1, 2012, the City Pension Plan was considered a defined benefit plan, meaning that after a period of years, the employee was vested. This means that the
employee would begin receiving a defined benefit amount based on a formula that takes into account the employee’s age at the time of retirement, length of service and highest three years of salary. For employees vested in the defined benefit plan prior to July 2012, the defined benefit plan remains in effect. Employees contribute 6 percent of their salary to this plan.

Employees hired and vested after July 1, 2012, are now required to make mandatory pre-tax contributions to a 401a Retirement Account which is managed through Empower Retirement. A 401 (a) plan is an employer-sponsored retirement plan offered by many government agencies, educational institutions and nonprofit organizations. The plan is considered a defined contribution plan, as the distribution at the time of retirement is based on the amount contributed and available in the fund. Employees are required to contribute 5 percent of their salary from each paycheck, and the City contributes 5 percent to the plan. There is a two-year vesting period before the employee is eligible to withdraw the match.

Employees may also make voluntary pre-tax contributions to a 457 Plan also administered by Empower Retirement, but these voluntary contributions are not matched by the City.

Fire and Police are also eligible to participate in a Deferred Retirement Option Plan (DROP) which is an optional benefit that allows eligible police officers and firefighters to accumulate a lump sum of money for retirement. This is an optional program with specific rules that apply for accessing the funds. The money is placed in the Trust until an employee exits the DROP program or retires.

Exhibit 4-6 provides a summary of the benefits provided by employee group.

Exhibit 4-6
Benefits Provided by Employee Group

<table>
<thead>
<tr>
<th>Bargaining Group</th>
<th>Health Coverage - % of Premium Paid by Employee</th>
<th>Pension Provider</th>
<th>Life Insurance Provided by City</th>
</tr>
</thead>
<tbody>
<tr>
<td>City- Exempt and Unaffiliated</td>
<td>16% all insured employees</td>
<td>City of Norwalk Pension Plan</td>
<td>2 X Annual Salary</td>
</tr>
<tr>
<td>Grant Employee (AFSCME, AFL-CIO)</td>
<td>16%</td>
<td>City of Norwalk</td>
<td>1 X Annual Salary</td>
</tr>
<tr>
<td>International Association of Firefighters, AFL-CIO</td>
<td>16%</td>
<td>City of Norwalk Fire Department Pension Plan</td>
<td>1 X Annual Salary</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Optional DROP plan</td>
<td></td>
</tr>
<tr>
<td>Norwalk Police Union, AFSCME, AFL-CIO</td>
<td>16%</td>
<td>City of Norwalk Police Department Pension Plan</td>
<td>1 X Annual Salary with a double indemnity rider</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Optional DROP plan</td>
<td></td>
</tr>
<tr>
<td>American Federation of State, County And Municipal Employees, AFL-CIO</td>
<td>16%</td>
<td>City of Norwalk Pension Plan</td>
<td>1 X Annual Salary</td>
</tr>
<tr>
<td>Norwalk Assistants and Supervisors Association</td>
<td>16%</td>
<td>City of Norwalk Pension Plan</td>
<td>2 X Annual Salary</td>
</tr>
<tr>
<td>Norwalk Municipal Employees Association</td>
<td>16%</td>
<td>City of Norwalk Pension Plan</td>
<td>2 X Annual Salary</td>
</tr>
</tbody>
</table>

Source: Compiled by Evergreen from interviews and Bargaining Agreements, December 2021.
Exhibit 4-7 through Exhibit 4-10 provide comparison data on a variety of employee benefits provided by a select group of peer organizations. As shown, in most categories the City is providing comparable or better benefits than its peers.

**Exhibit 4-7**

**Comparison of Paid Vacation**  
**In Hours Per Month**  
2021

<table>
<thead>
<tr>
<th>City</th>
<th>Max Carryover Hours</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk, CT</td>
<td>Varies</td>
</tr>
<tr>
<td>Newton, MA</td>
<td>6.7</td>
</tr>
<tr>
<td>Lynchburg, VA</td>
<td>10.0</td>
</tr>
<tr>
<td>Nashua, NH</td>
<td>8.0</td>
</tr>
<tr>
<td>Cranston, RI</td>
<td>6.7</td>
</tr>
<tr>
<td>Longmont, CO</td>
<td>8.0</td>
</tr>
<tr>
<td>Framingham, MA</td>
<td>NR</td>
</tr>
<tr>
<td>Santa Barbara, CA</td>
<td>8.0</td>
</tr>
<tr>
<td>Stamford, CT</td>
<td>NR</td>
</tr>
<tr>
<td>New Haven, CT</td>
<td>6.7</td>
</tr>
<tr>
<td>Waterbury, CT</td>
<td>3.3</td>
</tr>
<tr>
<td>Danbury, CT</td>
<td>NR</td>
</tr>
<tr>
<td><strong>Average (w/o Norwalk)</strong></td>
<td><strong>12.0</strong></td>
</tr>
</tbody>
</table>
Exhibit 4-9
Comparison of Group Life Insurance
2021

<table>
<thead>
<tr>
<th>City</th>
<th>Group life insurance provided?</th>
<th>Dollar amount for non-accidental death</th>
<th>Additional accidental death benefit provided?</th>
<th>Employee contributes to cost of insurance?</th>
<th>Group insurance for dependents offered?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk, CT</td>
<td>Yes</td>
<td>See Exhibit 4-6</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Newton, MA</td>
<td>Yes</td>
<td>$5,000</td>
<td>Yes</td>
<td>Yes</td>
<td>N/A</td>
</tr>
<tr>
<td>Lynchburg, VA</td>
<td>Yes</td>
<td>2x salary</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Nashua, NH</td>
<td>Yes</td>
<td>1.5x salary</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Cranston, RI</td>
<td>Yes</td>
<td>$100,000</td>
<td>No</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Longmont, CO</td>
<td>Yes</td>
<td>1.5x salary</td>
<td>Yes</td>
<td>No</td>
<td>N/A</td>
</tr>
<tr>
<td>Framingham, MA</td>
<td>Yes</td>
<td>$7,500</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Santa Barbara, CA</td>
<td>Yes</td>
<td>$50,000</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Stamford, CT</td>
<td>Yes</td>
<td>$50,000</td>
<td>No</td>
<td>Yes</td>
<td>N/A</td>
</tr>
<tr>
<td>New Haven, CT</td>
<td>Yes</td>
<td>$20,000</td>
<td>Yes</td>
<td>No</td>
<td>N/A</td>
</tr>
<tr>
<td>Waterbury, CT</td>
<td>Yes</td>
<td>2x salary</td>
<td>N/A</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Danbury, CT</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
</tr>
<tr>
<td>Overall (w/o Norwalk)</td>
<td>10</td>
<td>N/A</td>
<td>6</td>
<td>5</td>
<td>3</td>
</tr>
</tbody>
</table>

Source: Compiled by Evergreen through survey, January 2022.

Exhibit 4-10
Comparison of Other Insurance Coverages
2021

<table>
<thead>
<tr>
<th>City</th>
<th>Dental insurance provided?</th>
<th>City pays 100% of dental insurance?</th>
<th>Dependent dental coverage provided?</th>
<th>City contributes to dependent coverage cost?</th>
<th>Vision insurance provided?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk, CT</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Newton, MA</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Lynchburg, VA</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Nashua, NH</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Cranston, RI</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Longmont, CO</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Framingham, MA</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Santa Barbara, CA</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Stamford, CT</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>New Haven, CT</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Waterbury, CT</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Danbury, CT</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
<td>NR</td>
</tr>
<tr>
<td>Total (w/o Norwalk)</td>
<td>10</td>
<td>3</td>
<td>10</td>
<td>8</td>
<td>7</td>
</tr>
</tbody>
</table>

Source: Compiled by Evergreen through survey, January 2022.

**FINDING**

Although pension benefits for retirees are processed through MUNIS, much of the maintenance—such as the entry of cost-of-living increases—is done manually by the City’s Benefits Manager.
The Benefits Manager processes and maintains pension benefits for all City employees as well as the pensions for the BOE employees not in the Connecticut Teacher Retirement Plan. At the time of the study, there were 637 City retirees (including Fire and Police) and the 293 Board of Education retirees receiving pension benefits through the City Pension Plan.

Each retiree is set up in MUNIS showing the amount of the pension benefit and the deductions for tax and any other medical insurance or other deductions, similar to any other City employee.

Retirees are entitled to a Cost-of-Living Adjustment (COLA) and that is done automatically done by Comptroller on July 1 for all active employees, but for retirees it has to be done on the anniversary of their retirement or the anniversary of their birth date. The Benefits Manager keeps a grid for all retirees and manually calculates the cost of adjustment and enters the salary action into MUNIS. Each month, she manually processes approximately 10-20 COLA entries. As new people retire, she updates her file accordingly. If for any reason she does not manually make the adjustment, the retiree will not get the COLA to which they are entitled.

Some years ago, the Business Manager stated that she had discussed whether this could be automated with the Comptroller that was there at the time, but the request was denied. She has not pursued the request with the current Comptroller, but remains concerned that she is solely responsible for tracking when an employee is eligible for a COLA and making the manual calculation of the amount that each retiree should get on the date, they are eligible.

**RECOMMENDATION**

**Recommendation 4-5:**

*Work with the Comptroller and Information Technology to automate the retiree COLA calculation and change process.*

With the upgrades to MUNIS planned for April, there may be additional features that were not available in the current version; however, automation of the process should be possible.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### 4.4 RECRUITMENT, HIRING, AND RETENTION

The two HR Generalist positions are responsible for working with the department heads to post vacant or new positions and assist at various steps in the hiring process. The workload is shared, with either or both of the Generalists being assigned to work with individual departments at any given time. In this way, staff are knowledgeable of the working of all of the departments and can work interchangeably when needed.

The systems primarily used by the City in the Human Resources function include MUNIS for maintaining employee information and NeoGov for job posting purposes.
FINDING

Position control numbers are assigned to each employee at the time of hire, but are not used to control or monitor the number of budgeted positions.

Position control refers to the creation, maintenance, and monitoring of positions and their budgets. Each position is assigned a control number in the budget, and the dollars assigned to that position follow the control number—meaning that when an employee making $50,000 in the budget resigns, the amount attributed to that position control number is the amount available to fill the vacant position. Creating a new position requires a reallocation of funds to establish a budget for the new position. The City is loosely following the same process, but according to staff, one of the former Budget Directors used position controls, but when a new Budget Director came in, the process was discontinued. The numbers, however, are still assigned in the system. A new Budget Director was recently hired, and staff have not yet been apprised of how the new Director will want to set up the system.

From a budget standpoint, an organization can choose to define the position budgets manually, or the organization can let the system automatically define them in a way that allows the system to calculate position budget information for each new fiscal year as part of the budget process.

Additionally, restricting who can issue a new position control number for a position and implementing approval paths to control the creation on new positions without proper authorization is a basic fraud prevention tool. While no such concerns were identified in the City of Norwalk, in the absence of such controls some organizations have had staff set up fictitious employees and issue paychecks to those employees fraudulently.

RECOMMENDATION

Recommendation 4-6:

Work with the new Budget Director to set up a position control process that automates the position budgeting and monitoring processes.

An issue and recommendation relating to segregation of duties over payroll functions is addressed in the Chapter 3 - Financial Management of this report.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The posting and filling of vacancies is initiated by the hiring department, but Human Resources staff perform a number of manual processes that could be automated.

The department head enters a position requisition into MUNIS and sends an email to HR notifying them that a vacancy or new position needs to be filled. The HR Generalists double check the requisition information in MUNIS and MUNIS sends the requisition through the
approval path to the Chief Financial Officer and the Chief of Human Resources and Personnel. Once approved, the HR Generalists enter the position into NeoGov and upload the correct job description and salary information.

NeoGov does not have an internal posting process, so the HR Generalists copy and paste the information into an email and send the posting information to internal employees via email. There is a bid form that the internal employees use to apply for the job. Bid forms come to HR via email or the employees can drop it off in the office. HR has color coded paper files by union and all bid forms are kept in that folder.

If there are internal candidates, HR reviews their qualifications and refers the bid forms to the department head for a decision. If there are no internal candidates, the posting is sent out externally through NeoGov. Normally, the posting on NeoGov is the only type of advertising that is done. If, however, a department specifically requests additional advertisement, HR will handle the newspaper or other posting, but the department pays for the cost of the advertisement.

As applications are received, managers review the applications, select the ones they will be interviewing, and sends the list to HR. The HR Generalists review the candidate applications to ensure that they meet the qualifications before scheduling the interviews. In some instances, particularly with higher-level positions, they are instructed by the Chief to check all of the applications to make sure there had been no bias in the process of selecting candidates for an interview.

HR sets up the interviews and one HR representative sits in on the interviews. The hiring manager selects the other members of the selection committee and attempts to have people on the committee that are subject matter experts, which could include individuals from outside of the City, such as a client or someone from another town, depending on the job. There are from two to four people on the committee, depending on the position. Some informal training is provided to the selection committees, according to information provided during interviews; however, with HR staff as part of the committee, procedural concerns are generally addressed as they arise.

Once someone is selected, the Hiring Manager will make a recommendation for hire. HR prepares an offer letter that includes the title, salary information and benefit information and a statement that the offer is contingent on the results of all of the various background and drug screenings. A copy is sent to the union president, when applicable, but the Hiring Manager is not always copied.

The candidate is given approximately a week to respond. If the candidate accepts the offer, HR initiates the reference checks and conducts the background check, drug screening, and other required screenings, depending on the type of position. The City pays for the screening. Results of the reference checks and screenings are reviewed and, assuming all results are good, HR emails the candidate and hiring manager and they establish a mutually agreed to start date.

HR initiates an onboarding ticket in a portal that Information Technology set up so that they were notified about the need for them to set the employee up in the various systems.
New hire paperwork is sent to the candidate via email which includes a benefit packet links to the provider website and information on how to sign up for the various medical and other benefits.

Once all of the new hire information is received, the HR Generalist sets the employee up in MUNIS and in the benefits provider website.

During COVID, HR has not been doing new employee orientation, but they will set up a call or Zoom session with the new hire to discuss the new hire packet and introduce them to the benefit programs. Some new hires choose to come in and the HR Generalist will sit with them to answer their questions.

Mandatory training, such as sexual harassment training, has not be provided to new employees during COVID—although the Department has a method for tracking the training when it has been completed by the employee.

Norwalk Public Schools is using a Frontline Applitrack system that automates the process for initiating a posting request, accepting applications, prescreening candidates, providing candidates with offer letters, new hire paperwork and links to some mandatory training sites. While this system may not be the best system for the City to use, it illustrates that functionality that is available in other applications.

**RECOMMENDATION**

**Recommendation 4-7:**

**Research and implement a talent acquisition system with end-to-end workflow for posting, hiring, and onboarding applicants.**

Information Technology should be involved in the research and implementation activities and to the extent possible, attempt to identify a system that will interface with MUNIS to reduce redundant data entry.

Once the new system is implemented and efficiencies are attained, consider whether the Department can absorb some or all of the posting and onboarding processes currently carried out by Public Safety. Public Safety could still handle much of the recruiting, vetting and hiring processes that are specific to Public Safety, but may benefit from a more efficient talent acquisition system in general.

**FISCAL IMPACT**

The cost differential between what the City is paying now for NeoGov and the cost of the system chosen by the City cannot be estimated at this time, as costs differ by system. If the cost of a new system significantly exceeds the current costs for NeoGov, a cost-benefit analysis should be made to determine how the system can make the department more efficient by improving workflows and hiring times, reducing redundancies and relieving staff of manual duties.
FINDING

The Human Resources function is paper-intensive, and the HR Department has no immediate plans for digitizing it records at this time.

Every employer has three files—recruitment, medical and general. There is also a separate file for all I9 forms. Each of these are kept in separate file folder in different areas. The Connecticut State Library publishes records retention schedules prescribing the number of years that each of these files must be maintained, and the City Clerk is responsible for ensuring compliance with those requirements. Archived personnel files are maintained in the basement of the City Hall, and there is a process for requesting files from those archives.

Many governments have begun to digitize archived and some current records. The retention periods prescribed by the state are the same, but the space required to hold paper documents is reduced and the retrieval on information is simplified as the records are searchable.

RECOMMENDATION

Recommendation 4-8:

Work with Information Technology and the City Clerk to begin the process of digitizing records for retention purposes.

Following state guidelines, HR staffing should begin storing current information electronically, where possible, to immediately eliminate the need for paper.

FISCAL IMPACT

The cost for digitizing all City records is recognized in this report under the City Clerk recommendations.

FINDING

Some job descriptions are outdated, and many appear to be a brief description that was used for a job posting.

The formats for the job descriptions vary, with some containing information such as the physical requirements of the job while others do not. According to department staff, over the past five years, as vacancies occurred and new postings were requested, the historical position description was reviewed. The requesting department was sent the position description for review and asked for suggested amendments. When Union representative participation was in order, the revised position description was reviewed with the Union President.

The primary reason that employers need accurate and up-to-date job descriptions is that the job description communicates the current scope of a particular position. assists in the recruitment process, provides new employees with an outline of their job expectations and is used to evaluate an employee’s performance.
RECOMMENDATION

Recommendation 4-9:

Update the job description to include information on the current duties and responsibilities of each position.

A standard format for the descriptions should be developed and, for all union employees, the assistance of the union presidents should be requested.

FISCAL IMPACT

The cost for digitizing all City records is recognized in this report under the City Clerk recommendations.

4.5 LABOR RELATIONS

As shown in Exhibit 4-11, the majority of City employees are represented by six bargaining groups. A salary plan document for unaffiliated and exempt employees is also available on the City Website along with the other bargaining agreements, and contains some, but not all of the provisions of a standard contract.

Exhibit 4-11
Employee Bargaining Units

<table>
<thead>
<tr>
<th>Bargaining Group</th>
<th>Employees Covered</th>
<th>Contract Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>City- Exempt and Unaffiliated</td>
<td>Employees not otherwise members of a bargaining group</td>
<td>N/A</td>
</tr>
<tr>
<td>Grant Employee (AFSCME, AFL-CIO)’s</td>
<td>Nutritionist, WIC Bilingual Project Assistant, Local WIC Site Nutritionist, Project Coordinator, Health Education Associate, Disease Intervention Specialist, IAP Coordinator</td>
<td>7/1/2020 to 6/30/24</td>
</tr>
<tr>
<td>International Association of Firefighters, AFL-CIO</td>
<td>All uniformed and investigatory and maintenance positions within the Norwalk Fire Department, except that of Chief and Assistant Chief of the Department</td>
<td>7/1/2020 to 6/30/24</td>
</tr>
<tr>
<td>Norwalk Police Union, AFSCME, AFL-CIO</td>
<td>All full-time and permanent investigatory and uniformed members of the Police Department with the authority to exercise police powers, up to and including the rank of Inspector</td>
<td>7/1/2020 to 6/30/24</td>
</tr>
<tr>
<td>American Federation of State, County and Municipal Employees, AFL-CIO</td>
<td>All employees in the Department of Public Works, Parks, Recreation, Custodians, Fleet Services and Dispatchers who are not elected and who do not have the authority to hire and fire and/or to assign and direct work</td>
<td>7/1/2020 to 6/30/24</td>
</tr>
<tr>
<td>Norwalk Assistants and Supervisors Association</td>
<td>All supervisory employees certified by the Connecticut State Board of Labor Relations (Decision No. 1726, dated March 8, 1979, and Decision Supplement No. 1726-a, dated June 26, 1979) and for all supervisory employees that the City and NASA mutually agree should be represented by this bargaining unit</td>
<td>7/1/2020 to 6/30/24</td>
</tr>
<tr>
<td>Norwalk Municipal Employees Association</td>
<td>all employees of the City of Norwalk not already legally included within other recognized employee groups, and who are affiliated with the following departments: Department of Finance, Budget and Systems, Tax Collector, Tax Assessor, Purchasing, Comptroller, Town Clerk, Fair Rent and Human Relations, Personnel and Labor Relations, Library (Norwalk and South Norwalk), City Clerk, Registrar of Voters, Planning and Zoning, Corporate Counsel, Code Enforcement, Conservation Commission, Youth Services, Health, Public Works, Recreation and Parks, Civil Preparedness, Fire, Police and Information Technology, who are not employed in a supervisory capacity as defined in Section 7-4 71 of the General Statutes of the State of Connecticut, as amended</td>
<td>7/1/2020 to 6/30/24</td>
</tr>
</tbody>
</table>

Source: Compiled by Evergreen from interviews and Bargaining Agreements, January 2022.
During contract negotiations, the Chief is the primary negotiator, with the Administrator sitting in on the negotiations. No legal counsel is involved in City negotiations. The Mayor, union President, and the Chief sign off on the final agreed to changes to the contracts, which are then sent to the Common Council for ratification. Once approved, the full contract is again signed by the Mayor and Chief of behalf of the City and the union president and vice president, in most cases, for the union. All six of the union contracts expired in June 2020 and interim agreements were reached for 2021. Final contracts through 2024 were signed and ready to be sent to Common Council in January 2022.

**FINDING**

Although the Chief of Human Resources and Personnel, and the Personnel Administrator, stated that they meet regularly with the union presidents and representatives, the Department does not hold regularly scheduled monthly consultations with each of the union presidents.

The Personnel Administrator stated that he maintains a close relationship with management regarding the proper handling of discipline and sits as second chair to the Chief during contract negotiations with the unions. When necessary, the Chief conducts any hearings, consults with the union presidents as required in the contracts, and generally maintains a good repour with the unions. Some, but not all of the union contracts contain a reference to some type of consultation on a regular basis.

Some national and international organizations have published protocols for union consultations, which recognize the value of regularly scheduled consultation rather than needs-based consultation relating to a matter where a disagreement has arisen. While each organization seems to differ in their approach, the key elements and benefits include the following:

- better and more consistent communication - a meaningful exchange of accurate information and views;
- improving employee awareness of challenges and issues facing the organization – making the union a partner in developing solutions;
- proactive collaboration on individual employee concerns – involving the union in remediating performance in advance of formal disciplinary actions where possible; and
- reacting to and remediating concerns from employees – an opportunity to hear and potentially respond to emerging concerns prior to escalation to a grievance, when possible.

The City of Norwalk appears to have a positive relationship with the unions, but Evergreen observed some growing morale issues among its employees. Implementing a communication flow through regularly scheduled consultant may be one tool for addressing this concern.

**RECOMMENDATION**

**Recommendation 4-10:**

Implement monthly consultation sessions with each union president to include discussions regarding emerging issues and employee performance matters, when appropriate.
While the current Chief had an open relationship with the bargaining units and their representatives, the new Chief and current Administrator should initiate a calendar for monthly meeting with each union president and begin meeting as soon as practically possible.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### 4.6 PERFORMANCE EVALUATIONS

When properly managed, fair, honest and constructive employee performance evaluations can build trust, provide employees an opportunity for growth and open lines of communication between management and employees. In a unionized environment, many employees feel that seniority is the only way to move ahead in the organization; good work goes unnoticed, and poor performers are rewarded with the same compensation and benefits as those who are going the extra mile. To mitigate this employee morale challenge, it is important that management understand that all employees want and need feedback to affirm their value to the organization. While a performance evaluation can provide a level of documentation needed for disciplinary actions, the evaluation and goal setting process should provide management and the employee an opportunity to discuss ways to continually improve performance.

**FINDING**

City employees are not consistently given performance evaluations nor is progressive discipline used by management to improve poor performing employee performance.

Although all City bargaining agreements contain language to the effect that no employee may be dismissed unless for just cause, not all agreements grant explicit authority to management to conduct annual performance evaluations or discipline, demote or fire employees based on poor performance.

**Exhibit 4-12** provides a summary of the references to performance evaluations and discipline in each of the bargaining agreements.
### Exhibit 4-12
Reference to Performance Evaluations and Disciplinary Actions

<table>
<thead>
<tr>
<th>Bargaining Group</th>
<th>Performance Evaluation</th>
<th>Discipline</th>
</tr>
</thead>
<tbody>
<tr>
<td>City- Exempt and Unaffiliated</td>
<td>Yes – agreement links pay to performance</td>
<td>Yes</td>
</tr>
<tr>
<td>Grant Employee (AFSCME, AFL-CIO)s</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>International Association of Firefighters, AFL-CIO</td>
<td>Yes Implied in that Section 3…if any employee's performance has continually shown and proven to be inadequate, and/or not in keeping with Department high standards, the Commissioners may deny an increment to that employee for the forthcoming year provided that such employee has been warned in writing concerning his performance and has been given an opportunity to improve same…</td>
<td>Yes, see Section 5 Discipline</td>
</tr>
<tr>
<td>Norwalk Police Union, AFSCME, AFL-CIO</td>
<td>Yes Implied in that Section 3 if the performance of any regular member of the Police Department has continually shown and proven to be inadequate and/or not in keeping with the Department’s high standards, the Commissioners may deny an increment to such member provided that such member has been warned in writing concerning his/her performance and has been given an opportunity to improve same.</td>
<td>Yes, See Article 19</td>
</tr>
<tr>
<td>American Federation of State, County and Municipal Employees, AFL-CIO</td>
<td>Yes, Section 44.12 each telecommunicator shall have an annual performance appraisal. The appraisal shall exclusively be used as a feedback tool and shall not be used for disciplinary purposes.</td>
<td>Yes</td>
</tr>
<tr>
<td>Norwalk Assistants and Supervisors Association</td>
<td>Yes, implied in Management Rights with the stipulation that: “In the event the City implements a new evaluation plan, it will meet and confer with the union prior to its implementation.”</td>
<td>Yes</td>
</tr>
<tr>
<td>Norwalk Municipal Employees Association</td>
<td>No</td>
<td>Yes</td>
</tr>
</tbody>
</table>

Source: Compiled by Evergreen from Bargaining Agreements, January 2022.
For employees not covered by a bargaining agreement, the Policy Manual, last updated in 1990, provides both the requirement for an annual performance evaluation with disciplinary steps leading to termination.

VI. PROBATIONARY PERIOD

Section 6 …During the probationary period, two (2) written performance evaluations shall be prepared by the Department Head or the appointing authority, or the appointing authority in conjunction with the Mayor. The evaluations shall recommend whether the employee should receive permanent status or be required to resign.

VII SALARIES, WAGES AND BENEFITS

Section 7

a. Employees not covered by a Collective Bargaining Agreement will not be entitled to an increase in salary until they have completed their probationary period. Future salary adjustments would be based on a performance evaluation.

b. The Mayor or his/her designated representative shall establish an annual evaluation system for all employees based on standards of performance and shall establish regulations for its use.

c. The evaluation will be used to establish a salary based on performance for the following fiscal year for employees not included in a collective bargaining agreement. Two (2) unsatisfactory performance evaluations will be cause for dismissal.

RECOMMENDATION

Recommendation 4-11:

Develop language that gives management the authority to implement a fair, honest and open performance evaluation system that emphasizes the goal of continual improvement, as union contracts are renegotiated.

Evergreen is not recommending a merit system, but rather a meaningful way for employees to receive feedback on their current performance and to work with management toward a goal of continual improvement. The development of a system can begin immediately in collaboration with the unions that already have such clauses in their agreements and should provide the groundwork for changes to other agreements once they can see the plan in action.

FISCAL IMPACT

This recommendation can be implemented with existing resources.
CHAPTER 5:
COMMUNITY SERVICES
5.0 COMMUNITY SERVICES

The Community Services Department (CSD) was created in 2019 by bringing together three established departments – Health, Library, Human Relations and Fair Rent and creating a fourth department, Human Services, from established programs in early childhood and youth services. Merging departments and programs is often done to reduce span of control for leadership and to bring about efficiency. One of the most difficult tasks is changing the culture within the separate entities that both preserves their uniqueness and professionalism while at the same time creates a new identity for the organization. An important part in the creation process is to put the structural elements in place such as terminology, job descriptions, and integrated processes.

CSD is in the process of creating a new identity and this process has, in some ways, slowed because of the pandemic, but also, the pandemic has brought some programs together collaboratively to meet the overwhelming demands of the time. The recommendations in this chapter, in large part reflect the actions necessary to solidify the organizational fundamentals particularly departmentation and delegation, span of control, and chain of command of the newly developed CSD.

This chapter reviews the management and organization of the CSD and its individual departments, and includes five sections:

5.1 Management and Organization
5.2 Health Department
5.3 Library
5.4 Human Services Department
5.5 Human Relations and Fair Rent

5.1 MANAGEMENT AND ORGANIZATION

CSD is led by the Chief of Community Services and houses three active departments: Health Department, Library, and Human Services Department and one department, Human Relations and Fair Rent, which currently has no staff. The Chief reports to the Mayor.

Exhibit 5-1 shows the current CSD organization chart which includes four initiatives under the Chief – English Language Learner Mental Health and Family Support Services, Food Access Alliance Coalition, the Community Impacts Grants, and Equity and Justice for All Commission.
FINDING

The current structure of the CSD does not optimize departmentation, delegation, or span of control.

The Chief is responsible for managing and directing personnel, planning and budgeting to achieve the stated purpose of the department, establishing and monitoring policies and procedures by which the organization will operate, and monitoring outcomes and performance standards to ensure the organization is operating at peak efficiency and effectiveness.

As shown above, there are four departments: Human Relations and Fair Rent, Health Department, Library, and Human Services Department. At the time of the study, the Human Relations and Fair Rent Department had no employees.
Exhibit 5-1 shown previously also includes three initiatives that are currently led and monitored and led solely by the Chief: Community Impact Grants, Food Access Coalition and Equity & Justice for All Initiative. While the Chief indicated that these initiatives take only a limited amount of his time, he has been reluctant to assign ownership of these initiatives to another staff person due to the Director vacancy in Human Services.

The current organizational structure with four departments and three programs increases the Chief’s span of control and detracts from his main responsibilities including to direct and oversee work of all departments within the CSD. Organizationally, it appears that Human Relations and Fair Rent and the three programs are more functionally aligned with the newly developed Human Services Department.

The Society for Human Resource Management (SHRM) suggests that leadership, organization, jobs, and people must be aligned for profitable performance. Organization, in this context, is defined as structure, processes, and operations. CSD is relatively young as an organization and as a result the structure and processes are not fully developed. The operation of the CSD is not fully developed although the operation of individual programs is developed since many have been operating for years.

Five elements are needed to create an organizational structure and are represented in an organization chart: job design, departmentation, delegation, span of control, and chain of command. SHRM defines departmentation as “the way an organization structures its jobs to coordinate work”, span of control as “the number of individuals who report to a manager”, and chain of command as “line of authority.

A review of 11 peers, identified by the City, found each locality organized the collective of health, human services and the library differently in accordance with state statutes and local needs. Two peers have a Community Services Department and neither reflect the same structure as the City of Norwalk.

Longmont, CO has a library and social service type functions with no health department. New Haven, CT has health and social service type functions with no library.

While the City’s approach does not mirror any of its peers, it is in line with peers in developing an approach that fits local needs. Although common services are aligned, the present structure of the Community Services is structurally disjointed, the Chief is operating as the primary facilitator for programs and initiatives without staff support which distracts him from his primary role as leader and director of the whole of Community Services.

RECOMMENDATION

Recommendation 5-1:

Reorganize Community Services functions, programs and departments under the three main departments, and assign staff to oversee programs that are currently the sole responsibility of the Chief.
The Human Relations and Fair Rent Department should be dissolved, and the ADA Coordinator, and Fair Rent Investigations should be assigned to Human Services. Three programs under the Chief to the Human Services Department should be assigned as shown in Exhibit 5-2. Further discussion of issues relating to each department are contained in the remainder of this chapter.

**Exhibit 5-2**
**Proposed**
**Community Services Department Organizational Chart**

**FISCAL IMPACT**

This recommendation eliminates the Director of Human Relations and Fair Rent position, but the assumption is that the function will still need to be staffed by a Program Manager or lower-level position. Program Managers have an estimated salary of $83,000 annually and Directors typically make an average of $120,000, which would result in savings of $37,000 annually. With benefits of 69.89 percent, the total savings would be $62,859.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reorganize Community Services Functions</td>
<td>$62,859</td>
<td>$62,859</td>
<td>$62,859</td>
<td>$62,859</td>
<td>$62,859</td>
</tr>
</tbody>
</table>

Source: Created by Evergreen Solutions, February 2022.
FINDING

The relationship and role of the CSD Chief to each department is not clearly articulated in ordinances and job descriptions and negatively impacts chain of command.

Both the Health Department and the Library have associated Boards. The relationship between the Health Department Director and the Board is clearly defined. However, the ordinance has not been updated to include the role of the Chief of CSD nor does the Health Department Director’s job description list a supervisor.

The relationship between the position of Library Director and the Public Library Board is not clear in Chapter 87, nor does the ordinance elaborate on requirements that are found in state statute. Chapter 190 of the General Statutes of Connecticut, Public Libraries Sec. 11-33 outlines the power and duties of public library boards in municipalities. This section of statute includes language on the appointment of the Library Director and assistants including determination of compensation. Since these are duties typically done by a department head, the delineation of responsibilities between the Public Library Board and the CSD Chief should be outlined in both the ordinance for the Public Library Board and the ordinance covering the CSD.

Article X, Department of Social Services is listed under Charter and Special Acts establishing a Board of Social Services and a Director of Social Services. This does not reflect the current organization and should be updated or deleted. There is no Director of Social Services.

Department head job descriptions provided for the study vary in supervisory descriptions. The Library Director’s job description has a section for “Supervised By” but does not clearly articulate who supervises this position. The Health Department Director’s job description says the position reports to the Mayor while the Human Services Director’s job description clearly states the Chief is the supervisor. The Chief’s position definition in the job description states “Departments supervised and administered by this position include Fair Rent and Human Relations, Library Services, Health Services and Human Services” indicating direct supervisory responsibilities.

The lack of clarity in roles and responsibilities, including supervisory responsibility, can result in competing priorities, may undermine efforts to achieve the CSD mission, and does not result in a clear chain of command.

RECOMMENDATION

Recommendation 5-2:

Update City ordinances to clearly define the CSD Chief role and responsibilities, and modify job descriptions for the Chief and the department heads to clearly articulate supervisory responsibilities and relationships.

In particular, Chapter 87, Public Library Board ordinance, should be updated to clearly define the Board’s role regarding hiring, assessing performance, and firing the Director and other Library personnel.
Chapter 33, for the Community Services Department should be updated to clearly define the Chief’s role in Library personnel hiring, oversight, and the like.

Chapter 57 should clearly define the Chief’s role in relation to Health and Sanitation.

Article X should be updated or rescind the Department of Social Services to reflect the current CSD organization.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING**

The mission of CSD is to:

...increase and sustain the social well-being and health of all Norwalk residents. The CSD provides oversight and administrative support to departments; unifies initiatives and programs that directly affect the social well-being and health of the residents of Norwalk and support the quality of life in Norwalk through the lifespan.

The focus on unification of initiatives and programs directly supports efficiency of service delivery. The mission statement provides a foundation for performance around which leadership, organization, jobs, and people can be aligned.

**COMMENDATION**

The Community Services Department has developed a strong mission statement focused on integration of services.

**FINDING**

While the CSD mission statement is strong and organized, documented actions needed to meet the mission are lacking. The work needed to unify across the CSD requires deliberate action. It was clear in every interview and focus group of the staff’s commitment to providing their service to citizens, but many commented that collaboration across CSD could be improved. CSD has no tactical plan to put action behind the mission.

In the last two years, programs within CSD and Norwalk Public Schools have partnered in different ways responding quickly to community needs. A review of events in 2020 and 2021 are fruitful lessons in finding ways for increasing cross-functional collaboration and areas to build on in future operational and tactical plans. As examples in staff interviews, participants commented on how the Schools, Library and Health Department worked together on vaccine clinics and also suggested the library truck could be used as a way to advertise other CSD programs outside of the library similar to how the library partners with Early Childhood. Communication is often a predecessor to collaboration and staff interviews suggested that
communication is an area where CSD can improve. Ideas that staff suggested included periodic interdepartmental meetings or a newsletter may be an opportunity for information sharing.

Operational and tactical plans should not only include objectives for service delivery to citizens but also include objectives for internal efficiency and personnel development with an eye toward communication and collaboration across departments.

The Society for Human Resource Management and the Harvard Business Review suggest a few ways to create a culture of collaboration:

- align behind a common and well-communicated goal;
- create opportunities for employees to build rapport with one another outside of work meetings through coordinated events and activities to open lines of communication that lead to collaboration;
- develop competence not only in professional expertise but also relationship building;
- ensure clarity in roles and tasks; and
- foster open communication.

Currently, the Public Library Board has a strategic plan located on the Library website for 2019-2022. While the plan has a goal to develop new partnerships and collaborations, it does not include goals or objectives with CSD. The Health Department has been overwhelmed in supporting pandemic efforts and has not been able to update its strategic plan from 2019. The Human Services Department does not have any type of operational planning document.

To truly capitalize on the potential of housing health, human services, and the library together, the Chief and departments must develop goals and objectives that drive the CSD to unification.

**RECOMMENDATION**

**Recommendation 5-3:**

**Develop a tactical plan with performance measures that links CSD operations to the Citywide Strategic Plan recommended in Chapter 2.**

Each department within CSD should develop operational plans with performance measures that support the CSD plan.

To better align the library with CSD planning, Library planning should move from or be prepared in collaboration with the Public Library Board to allow for one plan that includes execution of policies implemented by the Public Library Board and for integration of the Library within CSD.
FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

While collaboration does occur between programs in CSD and Norwalk Public Schools (NPS), it is not institutionalized.

Several programs in CSD collaborate with NPS as shown in Exhibit 5-3. Examples of CSD and NPS meeting collaborations include weekly NPS health team and Health Department meetings, Community Provider calls, Healthy for Life meetings, and the Mayor’s COVID-19 planning and response meetings.

### Exhibit 5-3

**CSD Services Provided in Collaboration with NPS**

<table>
<thead>
<tr>
<th>Community Services Department</th>
<th>Human Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>- English Language Learner (ELL) School Based Initiative</td>
<td>- Restorative Justice Intervention</td>
</tr>
<tr>
<td>- Food Access Alliance Coalition</td>
<td>- Care Coordination and Referral</td>
</tr>
<tr>
<td><strong>Health</strong></td>
<td>- Peer Connection</td>
</tr>
<tr>
<td>- Food Establishments</td>
<td>- Family Navigator Program</td>
</tr>
<tr>
<td>- Sexual Health Clinic</td>
<td>- School Readiness Program</td>
</tr>
<tr>
<td>- Community Flu Clinics</td>
<td>- Head Start</td>
</tr>
<tr>
<td>- Community COVID-19 Vaccine Clinics</td>
<td>- Child Daycare</td>
</tr>
<tr>
<td>- Disease Surveillance</td>
<td><strong>Library</strong></td>
</tr>
<tr>
<td>- Child Health Services</td>
<td>- Library cards</td>
</tr>
<tr>
<td>- Community Health</td>
<td>- Cross-collaboration with mailing lists</td>
</tr>
<tr>
<td>- Emergency Preparedness</td>
<td>- Study Pods for Students</td>
</tr>
<tr>
<td>- Other Services: Epidemiology and Data Analysis</td>
<td>- Research</td>
</tr>
<tr>
<td></td>
<td>- Cross Programming with BOE Curriculum, Youth Debates</td>
</tr>
<tr>
<td></td>
<td>- Summer Reading Program</td>
</tr>
<tr>
<td></td>
<td>- One Book, One Community</td>
</tr>
<tr>
<td></td>
<td>- Triage for information and services</td>
</tr>
<tr>
<td></td>
<td>- Norwalk History</td>
</tr>
<tr>
<td></td>
<td>- Educational, cultural and entertainment programs</td>
</tr>
<tr>
<td></td>
<td>- City of Norwalk cooling and warming center (during inclement weather)</td>
</tr>
</tbody>
</table>

Source: Collected from CSD by Evergreen Solutions, January 2022.

Discussions with employees revealed that, while there was collaboration, more could be done to institutionalize these approaches such as regular meetings, documented processes, and key contact information. In general, meetings between CSD and NPS personnel occurred on an ad hoc basis rather than routine. Processes and staff contacts are not written down and
communicated across the CSD staff and NPS. Staff who have been working in the City for a while know who to reach out to in NPS and how to do things while newer staff are not as familiar. Clearly identified processes will ensure continued collaboration particularly as staff leave and enter the organization.

RECOMMENDATION

Recommendation 5-4:

Develop written processes and communication channels that facilitate regular communication not only between CSD leadership and school leadership, but also among staff.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

5.2 HEALTH DEPARTMENT

In addition to day-to-day programs and services offered, the Health Department has carried the majority of the pandemic response for the City including coordinating testing, vaccinations, contact tracing and keeping the Mayor and residents informed. In addition, the Health Department worked closely with the Chief, CSD on response actions and worked closely with the Library as they provided critical vaccination space in areas easily accessible by citizens. Leadership and staff’s ability to pivot and adapt to the urgency and demands of the pandemic are a testament to the professionalism and dedication of staff.

FINDING

The Health Department is one of three nationally accredited health departments in Connecticut and one of 290 local health departments in the country which speaks to the professionalism and commitment of the staff. Of the 11 identified peers with health departments, only one, the City of Nashua, NH, is nationally accredited. National accreditation measures public health departments performance against nationally recognized, practice-focused and evidence-based standards. Once accredited, the public department is part of a continual process of development and improvement.

The Centers for Disease Control recommends national accreditation through the Public Health Accreditation Board. (PHAB). The seven-step process for accreditation is rigorous as identified in Exhibit 5-4. Health departments that maintain accreditation continually access performance and make improvements in operations.
**Exhibit 5-4**

**PHAB Accreditation Process**

<table>
<thead>
<tr>
<th>Accreditation Step</th>
<th>Major Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-Application</td>
<td>The department assesses readiness for application, completes online orientation and informs PHAB of intent</td>
</tr>
<tr>
<td>Application</td>
<td>The department submits application which is an agreement that the department will abide by the current and future rules of PHAB and complete applicant training</td>
</tr>
<tr>
<td>Document Selection and Submission</td>
<td>The department identifies and submits the documents that demonstrate conformity to established PHAB standards and measures</td>
</tr>
<tr>
<td>Site Visit</td>
<td>PHAB performs a site visit and evaluates the department on conformity, areas of excellence and areas of improvement</td>
</tr>
<tr>
<td>Accreditation Decision</td>
<td>PHAB reviews documentation and site visit report and makes a final determination.</td>
</tr>
<tr>
<td>Reports</td>
<td>Once accredited, departments are required to submit annual reports that address the PHAB identified areas of improvement as well as communicate continuing conformity with standards and measures</td>
</tr>
<tr>
<td>Reaccreditation</td>
<td>Re-accreditation is a new application and the entire process begins again</td>
</tr>
</tbody>
</table>

Source: Public Health Accreditation Board website, January 2022.

**COMMENDATION**

The Health Department establishes high standards for performance as shown through its national accreditation.

**FINDING**

Three software programs used internally by the Health Department are redundant, difficult to use, and, in one case, no longer technically supported.

The Health Department uses three city programs: FoxPro, MUNIS, and Municity. FoxPro was developed in-house by the City several years ago and supports environmental health as well as financial functions. Environmental Health uses FoxPro for data collection, generation of violation notices and other program requirements. On the financial side, revenue is input into FoxPro daily including clinical fees and payments, environmental permits and licenses, grant payments and checks. FoxPro is used to generate revenue summaries by category and pay types and to provide data and information in preparation for deposits that go to the Comptroller’s office. In addition, FoxPro is used to input bills and expenses and to generate requests for payment vouchers for invoices and partial payments forms against purchase orders to send to the Comptroller’s office.

The Health Department uses MUNIS to create purchase orders, monitor budgets, generate budget reports, and input budget requests. Environmental Health attempted to use Municity—a shared program with other City departments. Municity is an on-line application intended; to allow multiple departments to track licenses, permits and a host of other items; however,
Environmental Health personnel found the program was not user-friendly and required redundant entering of information.

The use of three software programs (FoxPro, MUNIS, and Municity) results in double entry as well as lost time in trying to fit the various programs into operational needs. During the Health Department interview, leadership indicated that training on MUNIS was needed to better utilize the software and the department is looking at a new web-based program to support environmental health.

**RECOMMENDATION**

Recommendation 5-5:

Continue with plans to utilize a web-based program for Environmental Health, provide training on MUNIS, and move as many of the financial tasks as possible away from FoxPro and into MUNIS.

Recommendations for a comprehensive IT needs assessment are included in Chapter 9 – Information Technology. During that assessment process, the City will be looking at ways to address the unique IT needs in each area while developing more integrated approaches for addressing the overall IT needs Citywide.

**FISCAL IMPACT**

There will be a cost associated and will depend on the programs chosen, current training rates, and the number of personnel to be trained.

5.3 **LIBRARY**

The City operates two library facilities: the Main Belden Library and the South Norwalk Branch. These libraries have a Public Library Board consisting of nine members. Five of the members are appointed by the Mayor, two are appointed from the First Taxing District, and two are appointed from the Second Taxing District. The Public Library Board has responsibility for the grounds and buildings, rules and regulations and, as outlined in state statute, appointment of the library director and assistants including setting compensation.

The Library facilities are located in two different taxing districts. The Norwalk Public Library System came about in the 1970s when the two smaller libraries became part of the City of Norwalk. Discussions with staff suggest that the two cultures are not fully integrated and while much is centralized within the library, the two buildings serve two different communities.

**FINDING**

The Library lacks clearly defined departmentation of operations which impacts its ability to run efficiently and collaboratively.
Three common themes were found in interviews:

- confusion over roles and responsibilities;
- lack of communication; and
- the need for more collaboration between the two libraries.

The current organization chart is shown in Exhibit 5-5. The Library Director also provided a proposed organization chart that adds an Outreach, Marketing, and Branding Specialist, and a Facilities Manager. The current organization reflects centralization in technical services, adult services, youth services, and access services.

Exhibit 5-5
Public Library Organizational Chart

Exhibit 5-6 shows the titles of the full-time staff positions found in the Active City Staff and Pay spreadsheet provided as part of the study.

Exhibit 5-6
Public Library Full-Time Job Titles

<table>
<thead>
<tr>
<th>Full-Time Position Titles</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Account Clerk I</td>
<td>1</td>
</tr>
<tr>
<td>Custodian</td>
<td>2</td>
</tr>
<tr>
<td>Director of Children’s Library Services</td>
<td>1</td>
</tr>
<tr>
<td>Director of Library Information Services</td>
<td>1</td>
</tr>
<tr>
<td>Director of Library Technology</td>
<td>1</td>
</tr>
<tr>
<td>Librarian</td>
<td>2</td>
</tr>
<tr>
<td>Library Assistant</td>
<td>6</td>
</tr>
<tr>
<td>Library Clerk</td>
<td>3</td>
</tr>
<tr>
<td>Library Director</td>
<td>1</td>
</tr>
<tr>
<td>Reference Librarian</td>
<td>3</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>21</strong></td>
</tr>
</tbody>
</table>

Source: City of Norwalk, November 2021.
The job descriptions provided by Human Resources match the titles found in the Active City Staff and Pay list but do not match the position titles found in the organization chart.

The bargaining agreement with the Norwalk Assistants and Supervisors Association directly references the Director titles shown above, and the pay grades assigned are at the director level. There are manager-level positions listed in the agreement at lower grades; however, the City pay chart shows the salaries of these positions are commensurate with the director level. Some documents reviewed refer to the Library Director as Executive Director; however, the City pay chart lists the position as a director at Grade 9.

A review of the job descriptions also found the following discrepancies:

- The Director of Library Services appears to perform the duties of Adult Services Manager.
- The Director of Library Technology oversees the Technical Services unit, but it does not appear as though any personnel are assigned to the Technical Services unit.
- The Director of Children’s Library Services performs the work of Youth Services manager on the organization chart.
- The Librarian, Reference Librarian, Library Assistant, and Library Clerk are not clear on supervision:
  - Reference Librarian reports to Division Supervisor
  - Librarian reports to Children’s Services Division Chief
  - Library Assistants receive general supervision from a Librarian but it is unclear what position is the reporting supervisor of Assistants.
  - Library Clerks receive general supervision from the supervisor of the department assigned, but it is unclear what position is the reporting supervisor of Clerks.
- There is currently no job description or individual filling the Access Services Manager position or Branch Manager position as indicated on the organizational chart; however, the Director has indicated that these descriptions are a work in progress.
- The Librarian and Reference Librarian have similar job descriptions with Librarians focusing primarily on youth.

Feedback from interviews overwhelmingly emphasized a lack of cohesiveness as well as collaboration both between and among the departments as well as between the two library locations. The organization chart suggests that all but the day-to-day operation of the two libraries is centralized resulting in an organization that is both functionally and geographically organized.
RECOMMENDATION

Recommendation 5-6:

Reorganize the Library Department functionally to ensure better departmental and location cooperation and cohesiveness.

While the final organization structure should be developed to best meet the needs of the City, the titles of Director positions should be changed to Assistant Directors as Directors should not report to other Director positions. The Reference Librarian title should be changed to Librarian and all librarians should be trained to perform in any role which is indicated in both job descriptions. This provides a cleaner organization chart and provides flexibility to move personnel as needed.

One potential avenue to generate cohesiveness is to change the Adult Services Manager/Director of Library Information Services position to Assistant Director of Library Operations and assign responsibility for the day-to-day, general operation of both libraries as shown in Exhibit 5-7.

Exhibit 5-7
Public Library
Proposed Functionally Based Organization Chart

Source: Created by Evergreen Solutions, January 2022.

The Accounting Clerk and Custodians could then be assigned to the Assistance Director of Library Operations. Librarians, Librarian Assistants, and Librarian clerks could also be assigned equitably to one of the three Assistant Directors based on need.

Policies should be developed for the rotation of personnel between branches and processes for communication flow within the Library System.
Job description titles should be updated to match the organization chart and the Human Resources pay listing. Each job description should clearly articulate linkages between the assistant director positions as well as between assistant directors and the Library Director.

**FISCAL IMPACT**

This can be accomplished with current resources. This assumes that the current directors will be grandfathered with their current salaries.

### 5.4 HUMAN SERVICES DEPARTMENT

The Human Services Department was created as part of the 2019 reorganization bringing together youth services, early childhood programs and adding youth programs. Unlike the other CSD departments, the Human Services Department is new and while the programs it oversees are established, the operation of the Department is not. During the time period of the study, the Human Services Department was without a director. Feedback was obtained from the individual programs of Youth Services, Early Childhood, Family Navigator and Community Resources.

**FINDING**

The Early Childhood Coordinator (ECC) works closely with the NPS Early Childhood Administrator and the School Readiness Liaison (Liaison). The ECC and the Liaison manage the School Readiness and Child Day Care Contract and work together to plan professional development opportunities for center-based and family childcare, determine how City and NPS funding matches will be allocated, and provide technical assistance to early childhood education programs. Given the degree with which these two positions interact, co-location makes internal communication easier and also provides better support to programs and families.

**COMMENDATION**

The co-locating of the Early Childhood Coordinator with the NPS School Readiness Liaison increases communication between the two sides of the Early Childhood Program and provides better service to caregivers and families.

**FINDING**

In early 2020, an NPS survey found that between seven and eight percent of families lacked technology or reliable access to the Internet. In August 2020, NPS and the Human Services Department used grant funding and partnered to establish the Connectivity Initiative—Family Navigator Program. The goal of the Family Navigator Program is to create a more equitable learning experience for Norwalk students by providing high quality, reliable internet service, knowledge and ability to use the internet to fully participate in virtual learning and to connect families to other services available in Norwalk.

The Family Navigator Program is built on trusted relationships, collaboration by the Navigator and the family, and the identification of needed resources. The program provides three levels of support:
• the first level provides reliable high-quality Internet;
• the second level provides digital literacy support; and
• the third level connects families to other services such as food, housing, mental health, and physical health.

The Final Evaluation of the first year of the program completed in August 2021 showed that 918 students were referred to the program. The program is entering its second year and is a good example of how programs can be used as entry points for access to a variety of services. In this case, families who need Internet access may very well need access to other support services.

**COMMENDATION**

The utilization of the Family Navigator Program to identify and find additional resources for families of school age children provides greater access to services without additional cost.

**FINDING**

The Human Services Department has not developed into a cohesive and integrated collection of programs, and the Department lacks clear understanding of roles and responsibilities and chain of command.

Staff are executing their programs, but feedback revealed a lack of synergy across the Human Services Department. Programs are initiated, but an overall vision is not articulated—although the Chief has provided PowerPoint presentations. Different documents and different presentations describe the programs differently which does not present a unified understanding of the Human Services Department. The terminology being used does not reflect the current organization and causes confusion.

The CSD website lists Youth Services and Early Childhood as department leaders which suggests these are stand-alone departments. The FY22 City Budget refers to the Director of Youth Services as a department director in addition to the Human Services Director, Health Department Director and Library Director. The Youth Services PowerPoint references the Youth Services Department. Inconsistencies in these documents perpetuate the previous organization structure and diminish the authority of the Human Services Director impacting the chain of command.

Job descriptions for positions within the department require updating. The Youth Services Director’s job description has not been updated to reflect the Human Services Department or supervision by the Human Services Director. The December 2021 CSD organizational chart shows Youth Services which now includes the Youth Program Manager. The chart does not indicate the reporting relationship between the Youth Services Director and the Youth Services Program Manager. Given that there is a Youth Services Director, the Youth Service Program Manager should report to this position and job descriptions updated accordingly. This lack of clarity and clearly defined roles inhibits the department’s cohesiveness, impacts the ability to be
synergistic across programs, and confuses the Human Services Director’s role and responsibilities.

A factor at the time of this study is the lack of a Human Services Director. This requires direct involvement by the CSD Chief and prolongs the culture change needed to unify Human Services. This also detracts from the Chief’s ability to address the needs of CSD overall.

The Director, when in place, should focus on:

- clearly outlining and defining roles and responsibilities within the department and updating job descriptions and City and CSD documents as appropriate; and
- integrating and executing early childhood, youth, family, and elderly programs.

At the time of this study, the position has been advertised and applications received.

**RECOMMENDATION**

**Recommendation 5-7:**

Update the Human Services Department organizational structure to create a cohesive and integrated collection of programs.

The roles, responsibilities, lines of authority, and reporting lines of each staff member should be defined and reflected on the organizational chart and job descriptions. **Exhibit 5-8** shows a proposed organizational chart.

**Exhibit 5-8**

Human Services Department Proposed Organization Chart

Source: Created by Evergreen Solutions, January 2022.
These positions currently exist; however, the job descriptions will need to be revised to reflect the modified duties and responsibilities.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### 5.5 **HUMAN RELATIONS AND FAIR RENT**

The Human Relations and Fair Rent Department is currently listed as a department in City documents. Prior to the arrival of the Chief of CSD, this department had staff providing support to the Human Relations Council and executing the Fair Rent program. Over the years, the staff became smaller and smaller and in the past year, the last person in the department resigned. The CSD contracts with an attorney for Fair Rent mediation.

**FINDING**

Human Relations and Fair Rent does not function as a department.

No staff are associated with either human relations or fair rent. The Human Relations Council has not met in over two years and the fair rent program is handled by a contract attorney.

Chapter 60 of the ordinances establishes the Human Relations Council to:

...to promote mutual understanding and respect among, and encourage and assure equality of opportunity for, all the people of Norwalk without regard for their race, color, religion, creed, national origin, ancestry, alienage, sex, age, marital status, sexual orientation (defined as heterosexuality, homosexuality, bisexuality, pansexuality, or asexuality, in each case whether actual or perceived), gender identity or expression, lawful source of income, familial status, past or present history of mental disability, intellectual disability, learning disability, physical disability, including, but not limited to, blindness or deafness, and/or status as a veteran; to conduct such programs of education, study, research, investigation and action as will contribute to carrying out the purposes and provisions of this chapter; and to cooperate with governmental and nongovernmental agencies and organizations in the field of intergroup relations and equal opportunities.

The Human Relations Commission webpage describes the purpose and responsibilities:

*Today, the Norwalk Human Relations Commission is working diligently with local officials to initiate programs to help people understand and comply with the laws of equality. The commission encourages all groups to work together to achieve mutual respect for each other, and to improve the quality of life in Norwalk.*

The Human Relations Commission has not been active in more than two years with the most recent meeting held on September 19, 2019. Some of the duties and powers listed in Chapter 60 are similar in nature to what could be positioned within Human Services such as programs and
initiatives focused on equity and inclusions. As an example, the CSD has funding for an ADA compliance position that will be pursued in the near term.

A review of Connecticut peer localities found that each handles human rights, equality and equity in different ways. Stamford, CT, has a Social Services Commission with responsibility for Fair Rent and Human Rights and has a Coordinator as staff. New Haven, CT, has a Commission on Equal Opportunities with an Executive Director and also a Fair Rent Commission with an Executive Director. Waterbury, CT, has a Human Rights Commission.

Regarding the Fair Rent Program, the CSD is currently using a contracted attorney to handle fair rent complaints with no staff associated. No issues were identified with this approach during discussions with the CSD Chief and, while Fair Rent is a Community Services type program, the skills needed are very specific. This is a common dilemma in public organizations, that is the question of whether to develop a skill in-house or contract out. Given the CSD focus to facilitate access to services rather than be the provider of choice, contracting this function out makes sense. Given its connection to Human Services, the appropriate place to facilitate this program is within the Human Services Department as a program under the Director.

RECOMMENDATION

Recommendation 5-8:

Continue to provide Fair Rent services through a contracted attorney, and update the ordinance associated with the Human Relations Commission to include the current CSD structure and clearly articulate responsibilities between the two.

Any human relations programs or initiatives, such as the proposed ADA Compliance Coordinator, should be housed within Human Services Department.

FISCAL IMPACT

This recommendation can be implemented with existing resources.
CHAPTER 6:
PUBLIC SAFETY
6.0 PUBLIC SAFETY

Of all services provided to citizens by local government, public safety has the most diverse, complex, and mission-critical assignment. Public safety agencies—emergency medical services (EMS), law enforcement, and fire departments—must operate 24 hours a day, seven days a week, and 365 days a year. Additionally, public safety operations occur in all environmental conditions. Since there is a likelihood for incidents to occur any time of day or night, law enforcement and fire department resources must be on constant alert trained, prepared, and ready to immediately respond to any event.

Public safety assignments range from life critical emergency operations tasks to preventing and providing safety and care to the community.

Life critical examples include:

- life threatening medical emergencies;
- crimes in progress by armed suspects;
- house fire with occupants inside; and
- traffic crash with injuries.

Community safety assignments include:

- public safety education;
- preparedness, response and recovery to emergencies;
- follow-up investigation of crimes committed;
- fire code inspections;
- pre-fire planning;
- traffic enforcement;
- community policing initiatives; and
- crime prevention.

While the role of public safety is similar in all cities and counties across the United States, each community establishes its own level of desired performance and standards of care that Law Enforcement and Fire Department resources must accomplish. For example, a response time to a life-threatening event may be acceptable in some communities but not acceptable in other communities. Because public safety operations are unique to every community, successful operations must have community involvement.

This chapter is organized into four sections:

6.1 Public Safety Organization and Management
6.2 Combined Dispatch
6.3 Police Department
6.4 Fire Department

There are many factors that are significant to public safety operations in a City, including the concentration of its population within a limited geographical size of the City, the transient nature of many of its service population; growth rate of the City’s permanent, seasonal, and tourist
public safety. These factors, and others, demand that the City have highly efficient and optimized Police and Fire Departments to meet the City’s public safety needs.

6.1 PUBLIC SAFETY ORGANIZATION AND MANAGEMENT

Streamlined, fast, clear, efficient, and effective public safety operations (e.g., workflows and business processes) are mission dependent on well-designed public safety technology systems. These systems form the foundation for how the Police and Fire Departments will operate.

Public safety technology systems must be:

- designed and configured to enhance department operations (e.g., workforce multiplier);
- dependable and resilient;
- high performing;
- redundant; and
- user friendly.

Public safety technology systems must be designed to meet operational objectives including:

- Public safety communication, collaboration and cooperation
- Public safety Operations Management:
  - Command and Control
  - Situational Awareness
  - Allocation and deployment of personnel and resources
  - Incident processing – Time, Accuracy, Quality & Actionable
  - System Status Management
- Employee productivity
- Quality of PSAP, Law Enforcement, Fire, EMS and Emergency Management work products
- Safety for Public Safety personnel and citizens
- Information Management
- Internal and external customer satisfaction
- Internal and external operational and administrative communication
- Ability to measure the effectiveness of strategies and tactics in a timely manner
- Ability for statistical analysis and forecasting
- Ability to leverage commercial data and social media aggregator systems

FINDING

Overtime expenditures in the Police and Fire Department are increasing at unsustainable rates and controls are difficult to maintain in light of staffing shortages in key areas.

Exhibit 6-1 provides a three-year summary of overtime hours and dollar amounts expended by the Police Department. The chart provides a breakout of overtime paid from General Fund as well as overtime paid by other funding sources. As shown, if General Fund overtime continues to be used at the same rate as it has during the first six and a half months of FY 22, overtime from General Fund will have increases by 30.2 percent between FY20 and the end of FY 22.
### Exhibit 6-1
**Summary of Police Department Overtime**
**FY 20 to FY 22 Projected**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Hours</td>
<td>Dollars</td>
<td>Hours</td>
<td>Dollars</td>
<td>Hours</td>
</tr>
<tr>
<td>General Fund</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Administrative Support I</td>
<td>1,371.3</td>
<td>$61,751</td>
<td>1,147.8</td>
<td>$52,748</td>
<td>1,032.0</td>
</tr>
<tr>
<td>Administrative Support II</td>
<td>199.0</td>
<td>$9,551</td>
<td>154.5</td>
<td>$7,626</td>
<td>1.063.4</td>
</tr>
<tr>
<td>Assistant Dog Warden</td>
<td>-</td>
<td>-</td>
<td>0.5</td>
<td>$24</td>
<td>34.0</td>
</tr>
<tr>
<td>Custodian</td>
<td>97.3</td>
<td>$2,412</td>
<td>25.0</td>
<td>$601</td>
<td>-</td>
</tr>
<tr>
<td>Dispatcher Supervisor</td>
<td>1,993.5</td>
<td>$117,741</td>
<td>2,019.3</td>
<td>$126,109</td>
<td>1,624.6</td>
</tr>
<tr>
<td>Dog Warden</td>
<td>92.0</td>
<td>$5,142</td>
<td>315.3</td>
<td>$18,427</td>
<td>63.5</td>
</tr>
<tr>
<td>Executive Secretary</td>
<td>34.5</td>
<td>$1,741</td>
<td>26.3</td>
<td>$1,425</td>
<td>1.5</td>
</tr>
<tr>
<td>Information Specialist (RC G13)</td>
<td>1,035.5</td>
<td>$57,735</td>
<td>918.0</td>
<td>$52,091</td>
<td>423.3</td>
</tr>
<tr>
<td>Kennel Keeper</td>
<td>335.5</td>
<td>$15,549</td>
<td>63.0</td>
<td>$3,382</td>
<td>50.5</td>
</tr>
<tr>
<td>Payroll/Account Clerk - Pol</td>
<td>2.5</td>
<td>$121</td>
<td>7.8</td>
<td>$382</td>
<td>1.8</td>
</tr>
<tr>
<td>Police Detective</td>
<td>2,071.5</td>
<td>$145,886</td>
<td>2,013.0</td>
<td>$146,581</td>
<td>1,167.5</td>
</tr>
<tr>
<td>Police Lieutenant</td>
<td>2,081.0</td>
<td>$176,102</td>
<td>2,593.5</td>
<td>$223,499</td>
<td>1,557.5</td>
</tr>
<tr>
<td>Police Officer</td>
<td>28,027.3</td>
<td>$1,792,639</td>
<td>30,841.3</td>
<td>$2,013,136</td>
<td>20,728.0</td>
</tr>
<tr>
<td>Police Sergeant</td>
<td>5,387.5</td>
<td>$413,480</td>
<td>6,343.0</td>
<td>$497,943</td>
<td>3,602.0</td>
</tr>
<tr>
<td>Telecommunicator I</td>
<td>145.8</td>
<td>$6,256</td>
<td>204.5</td>
<td>$9,106</td>
<td>478.5</td>
</tr>
<tr>
<td>Telecommunicator II</td>
<td>5,561.3</td>
<td>$315,216</td>
<td>5,442.5</td>
<td>$319,814</td>
<td>2,857.5</td>
</tr>
<tr>
<td>Total General Fund</td>
<td>48,435.3</td>
<td>$3,121,321</td>
<td>52,115.0</td>
<td>$3,472,894</td>
<td>32,444.3</td>
</tr>
</tbody>
</table>

**Extra Work OT Charged too Customers, Other Departments or COVID Expenses**

<table>
<thead>
<tr>
<th>Categories</th>
<th>Hours</th>
<th>Dollars</th>
<th>Hours</th>
<th>Dollars</th>
<th>Hours</th>
<th>Dollars</th>
<th>Hours</th>
<th>Dollars</th>
</tr>
</thead>
<tbody>
<tr>
<td>Police Detective</td>
<td>818.0</td>
<td>$72,690</td>
<td>1,523.5</td>
<td>$122,754</td>
<td>852.5</td>
<td>$68,145</td>
<td>1,573.8</td>
<td>$125,807</td>
</tr>
<tr>
<td>Police Lieutenant</td>
<td>2,392.8</td>
<td>$211,634</td>
<td>4,975.5</td>
<td>$434,816</td>
<td>2,666.0</td>
<td>$238,942</td>
<td>4,921.8</td>
<td>$441,123</td>
</tr>
<tr>
<td>Police Officer</td>
<td>8,058.8</td>
<td>$675,656</td>
<td>11,372.5</td>
<td>$908,383</td>
<td>4,723.5</td>
<td>$387,531</td>
<td>8,720.3</td>
<td>$715,441</td>
</tr>
<tr>
<td>Police Sergeant</td>
<td>2,566.0</td>
<td>$221,623</td>
<td>5,737.0</td>
<td>$468,560</td>
<td>2,374.5</td>
<td>$201,310</td>
<td>4,383.7</td>
<td>$371,650</td>
</tr>
<tr>
<td>Total Extra Work OT Charged to</td>
<td>13,835.5</td>
<td>$1,181,603</td>
<td>23,608.5</td>
<td>$1,934,512</td>
<td>10,616.5</td>
<td>$895,928</td>
<td>19,599.7</td>
<td>$1,654,020</td>
</tr>
</tbody>
</table>

**Change 2020 Actual to 2022 Projected**

-24.7% -20.6%
-63.1% -61.4%
100.0% 100.0%
-18.5% -10.1%
-92.0% -90.8%
-24.5% -21.3%
-72.2% -71.8%
29.2% 35.6%
4.0% 10.4%
38.2% 44.3%
36.5% 41.7%
23.4% 29.2%
506.1% 510.1%
-5.1% 0.7%
23.7% 30.2%
92.4% 73.1%
105.7% 108.4%
8.2% 5.9%
70.8% 67.7%
41.7% 40.0%
Exhibit 6-1 (Continued)
Summary of Police Department Overtime
FY 20 to FY 22 Projected

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Hours</td>
<td>Dollars</td>
<td>Hours</td>
<td>Dollars</td>
<td>Hours</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Police Detective</td>
<td>16.0</td>
<td>$1,068</td>
<td>4.0</td>
<td>$277</td>
<td>7.4</td>
</tr>
<tr>
<td>Police Lieutenant</td>
<td>71.0</td>
<td>$4,683</td>
<td>52.0</td>
<td>$3,525</td>
<td>60.0</td>
</tr>
<tr>
<td>Police Officer</td>
<td>656.5</td>
<td>$43,702</td>
<td>897.5</td>
<td>$60,423</td>
<td>329.5</td>
</tr>
<tr>
<td>Police Sergeant</td>
<td>130.5</td>
<td>$8,576</td>
<td>270.0</td>
<td>$18,262</td>
<td>266.5</td>
</tr>
<tr>
<td>Total Grants</td>
<td>858.0</td>
<td>$56,960</td>
<td>1,235.5</td>
<td>$83,279</td>
<td>660.0</td>
</tr>
</tbody>
</table>

| Police Asset Forfeiture Account |         |         |                 |                                  |                     |                 |                 |                 |                     |                 |                | 2020 Actual      | Projected       |
|                                  | Hours   | Dollars | Hours           | Dollars                          | Hours            | Dollars         | Hours            | Dollars          | Hours            | Dollars         | Change          | Change          |
| Police Detective                 | 5.0     | $358    | -               | -                                | -                 | -               | -               | -               | -100.0%          | -100.0%         |                 |                |
| Police Lieutenant               | 27.0    | $2,274  | -               | -                                | -                 | -               | -               | -               | -100.0%          | -100.0%         |                 |                |
| Police Officer                  | 63.0    | $3,993  | 44.0            | $2,875                           | -                 | -               | -               | -               | -100.0%          | -100.0%         |                 |                |
| Police Sergeant                 | 21.0    | $1,615  | 8.0             | $626                            | -                 | -               | -               | -               | -100.0%          | -100.0%         |                 |                |
| Total Police Asset Forfeiture Account | 116.0 | $8,240  | 52.0            | $3,501                           | -                 | -               | -               | -               | -100.0%          | -100.0%         |                 |                |
| Total All Categories            | 63,244.8| $4,368,124 | 77,011.0       | $5,494,186                      | 43,720.8         | $3,143,426      | 80,715.2        | $5,803,248       | 27.6%            | 32.9%           |                 |                |

Source: City of Norwalk Comptroller, February 2022.
Exhibit 6-2 provides a three-year summary of overtime hours and dollar amounts expended by the Fire Department. Similar to the Police chart, in the last two years the Fire Department experienced some COVID related overtime that was reimbursed to the Department. As shown, if General Fund overtime continues to be used at the same rate as it has during the first six and a half months of FY 22, overtime from General Fund will have increases by 30.1 percent between FY 20 and the end of FY 22.

Fire and Police overtime represent more than 90 percent of the total overtime expenditure throughout the City in any given year. Staffing shortages are the general explanation for the increases in overtime. In some instances, staffing cuts have also contributed to the need for overtime.

Another reason for overtime can be non-efficient scheduling practices. For example, the Fire Department has a minimum staffing number for each shift. When there are not enough firefighters to cover the shifts, firefighters are scheduled to work overtime in order for the shift to have the minimum number of staff.

The bargaining agreement states:

*Article 10 SECTION 3.*

**A. Staffing Levels:** When engine and/or truck companies leave a fire station to respond to an alarm or other related firefighting duty, they shall be staffed with no less than three (3) fire fighters and one (1) officer. Not less than a total of thirty-three (33) bargaining unit personnel shall be on duty on each shift, including one Deputy Chief, three (3) Captains and five (5) Lieutenants.

Overtime can and should be avoided assuming that a full contingent of firefighter(s) are hired, trained, and available to work. According to staff, a decision was made some years ago to leave a given number of positions open as the payment of 1.25 percent of salary for overtime was less expensive than hiring additional firefighters and paying full-time benefits of 73.52 percent of salary. Even when there are sufficient staff on the payroll, overtime is also needed to cover any sick leave or vacation taken by personnel.

As shown in the overtime lists, not only is overtime high for patrol officers and firefighters, but high-ranking individuals in both departments are working a significant amount of overtime. As noted in this chapter of the report, some overtime is being worked to perform administrative and support functions that could, in some instances, be covered by civilian staff.
### Exhibit 6-2
**Summary of Fire Department Overtime**
**FY 20 to FY 22 Projected**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Hours</td>
<td>Dollars</td>
<td>Hours</td>
<td>Dollars</td>
<td>Hours</td>
</tr>
<tr>
<td><strong>COVID Expense OT</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fire Captain</td>
<td>-</td>
<td>-</td>
<td>120.0</td>
<td>$7,808</td>
<td>221.5</td>
</tr>
<tr>
<td>Fire Inspector</td>
<td>-</td>
<td>-</td>
<td>12.0</td>
<td>$594</td>
<td>22.2</td>
</tr>
<tr>
<td>Fire Lieutenant</td>
<td>-</td>
<td>-</td>
<td>552.0</td>
<td>$32,502</td>
<td>1,019.1</td>
</tr>
<tr>
<td>Firefighter</td>
<td>-</td>
<td>-</td>
<td>1,620.0</td>
<td>$78,061</td>
<td>2,990.8</td>
</tr>
<tr>
<td><strong>Total COVID Expense OT</strong></td>
<td>-</td>
<td>-</td>
<td>2,304.0</td>
<td>$118,965</td>
<td>4,253.5</td>
</tr>
<tr>
<td><strong>General Fund</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Account Clerk II (Rc/G12)</td>
<td>18.5</td>
<td>$1,011</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Assistant Fire Chief</td>
<td>2,129.0</td>
<td>$137,010</td>
<td>1,651.5</td>
<td>$106,943</td>
<td>176.5</td>
</tr>
<tr>
<td>Asst. Fire Mechanic</td>
<td>4.5</td>
<td>$246</td>
<td>84.0</td>
<td>$4,299</td>
<td>34.5</td>
</tr>
<tr>
<td>Deputy Fire Chief</td>
<td>1,502.0</td>
<td>$102,845</td>
<td>2,028.0</td>
<td>$141,240</td>
<td>1,536.0</td>
</tr>
<tr>
<td>Deputy Fire Chief Training</td>
<td>984.0</td>
<td>$61,325</td>
<td>593.0</td>
<td>$38,495</td>
<td>52.0</td>
</tr>
<tr>
<td>Deputy Fire Marshal</td>
<td>67.5</td>
<td>$4,505</td>
<td>27.0</td>
<td>$1,845</td>
<td>49.8</td>
</tr>
<tr>
<td>Fire Captain</td>
<td>6,824.3</td>
<td>$417,963</td>
<td>7,329.5</td>
<td>$457,540</td>
<td>3,526.0</td>
</tr>
<tr>
<td>Fire Inspector</td>
<td>682.0</td>
<td>$32,535</td>
<td>1,288.5</td>
<td>$64,609</td>
<td>799.5</td>
</tr>
<tr>
<td>Fire Lieutenant</td>
<td>13,911.8</td>
<td>$746,226</td>
<td>16,142.0</td>
<td>$893,268</td>
<td>8,309.5</td>
</tr>
<tr>
<td>Fire Marshal</td>
<td>27.0</td>
<td>$1,933</td>
<td>12.0</td>
<td>$888</td>
<td>21.0</td>
</tr>
<tr>
<td>Fire Master Mechanic</td>
<td>140.0</td>
<td>$10,165</td>
<td>81.0</td>
<td>$6,021</td>
<td>149.5</td>
</tr>
<tr>
<td>Firefighter</td>
<td>54,493.5</td>
<td>$2,510,720</td>
<td>64,952.3</td>
<td>$3,068,098</td>
<td>40,140.5</td>
</tr>
<tr>
<td><strong>Total General Fund</strong></td>
<td>80,558.0</td>
<td>$4,010,803</td>
<td>94,306.8</td>
<td>$4,791,062</td>
<td>54,703.5</td>
</tr>
</tbody>
</table>

Source: City of Norwalk Comptroller, February 2022.
RECOMMENDATION

Recommendation 6-1:

Implement a plan to reduce General Fund overtime for both Fire and Police by a minimum of 15 percent each year for the next four years.

To implement this recommendation, a thorough analysis of the causes of the overtime will need to be completed. This includes:

- A department breakdown of overtime for 2019-2021 documenting the primary causes of overtime. For example:
  - scheduled overtime to achieve minimum mandatory staffing for a shift or assignment;
  - scheduled overtime to complete an external task (e.g., high school parking lot security example);
  - COVID related activities that required overtime;
  - City special events that required overtime;
  - public safety incidents that required overtime (e.g., major incident that requires personnel to not end their tour on time); and
  - “On call” personnel overtime (e.g., a detective is called out after hours, a fire scene requires investigation after hours).

- The Departments will need to evaluate and modify appropriate reasons for overtime and who may authorize overtime.

- As previously mentioned, aggressive measures will need to be taken to fill all vacancies, over and above the current recruitment efforts.

FISCAL IMPACT

Based on the projected General Fund overtimes of both departments of $9.3 million in General Fund overtime for this fiscal year, and the conservative use of $9 million for the year, a 15 percent reduction in 2022-23 would equate of savings of $1,350,000. As additional reductions are made each year the savings become cumulative as follows

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Overtime</td>
<td>$9,000,000</td>
<td>$7,650,000</td>
<td>$6,502,500</td>
<td>$5,527,125</td>
<td>$5,699,694</td>
</tr>
<tr>
<td>15% Reduction</td>
<td>$1,350,000</td>
<td>$1,147,500</td>
<td>$975,375</td>
<td>$829,069</td>
<td>$0</td>
</tr>
<tr>
<td>Cumulative Savings</td>
<td>$1,350,000</td>
<td>$2,497,500</td>
<td>$3,472,875</td>
<td>$4,301,944</td>
<td>$4,301,944</td>
</tr>
</tbody>
</table>
### Finding

The Police and Fire Departments share multiple systems such as 9-1-1, radio, Computer-Aided Dispatch, Mobile Data Computer applications, Geographic Information System, and Business Intelligence/Analytics system. They each also have unique systems such as a Law Enforcement and Fire Records Management System, specialty applications and state and federal reporting software systems.

In addition, the Departments share City IT services including the City’s infrastructure (e.g., data center, networks) and two IT support positions.

The City does not have a Public Safety Technology Master Plan based on department strategic objectives, operational requirements and industry standards, best practices and guidelines.

The Police and Fire Departments are seeking a new Automatic Vehicle Location (AVL) system separate from each other. Since both departments are on the same CAD system and dispatched by the Combined Dispatch Center, there should be a single AVL solution that is integrated with the CAD/Mobile system. This will provide a single common operating picture of all public safety resources and enhanced situational awareness at all public safety events.

Currently, Police, Fire and IT staff do their best regarding public safety technology systems even though they have not been professionally trained and/or provided subject matter expert assistance.

All personnel interviewed advised there are no subject matter experts regarding:

- modern public safety technology systems (e.g., functionality, features, capabilities);
- leveraging public safety technology systems for maximum operational effectiveness and time efficiency; and
- design and configuration of current systems.

Both Departments are engaged in the procurement and implementation of new technology systems to fill gaps in current systems without a formal Technology Master Plan. This includes a major Citywide Radio System upgrade project that will benefit both Police and Fire operations.

### Recommendation

**Recommendation 6-2:**

Develop and implement a Public Safety Technology Master Plan.
A Public Safety Technology Master Plan includes three key components:

- current state assessment;
- future state objectives and requirements; and
- gap analysis.

Each component includes a detailed set of elements for review and sample assessments are available from numerous sources.

**FISCAL IMPACT**

The current assessment and future objectives can be completed with existing resources. For some topics, the City will need external assistance which can be obtained through various methodologies that may or may not have a fiscal impact.

**FINDING**

The NexGen CAD/RMS system does not provide the functionality, features, and capabilities required by Police and Fire Departments.

The NexGen CAD/RMS system was installed in approximately 2001. There are no personnel in Police, Fire and IT who are experts regarding the full capabilities of the NextGen system. For some CAD/RMS workflows, Police, Fire and IT personnel do not know why the system was configured in the manner it is today.

The CAD/RMS system is not designed or configured to provide the Police and Fire Departments the functionality needed for a City the size of Norwalk. For example, for each department:

- **Fire Department**
  - The CAD system is not configured for complex response plans to ensure the correct assignment of resources are deployed for a specific type of incident. NFD views the CAD system as more a Police system than Fire system
  - The CAD system is not configured to achieve Direct Dispatch operations (e.g., fastest methodology to get wheels rolling for a life critical incident)
  - The CAD system does not have integrated Automatic Vehicle Location (AVL) functionality to achieve closes/fastest unit dispatching which NFD wants to employ

- **Police Department**
  - NPD employs two fulltime “coders” to manually enter National Incident Based Reporting System (NIBRS) information. This process requires the two coders to read all NPD incident reports and to then enter NIBRS information in the RMS. There is an average delay of two weeks to complete the NIBRS process. Additionally, time is expended by the coders and officers when questions must be answered prior to
entering the NIBRS data. Modern Records Management Systems capture the NIBRS information on the front end when the officer/detective is completing the report. A modern RMS will save a significant amount of time and will provide the ability to re-assign the coders to other tasks

- The NexGen RMS does not have Case Management functionality. The NPD Detective sections print hard copies of all incident reports and employ a manual case file and Case Management process. A significant amount of time, paper, files, resources and space is used to support this manual process. Modern systems have Case Management modules allowing all these tasks to be completed in the RMS thereby saving time and paper/filing costs

- A police RMS should provide an integrated solution for all information regarding persons, places and things. The ability to flag a name, address, vehicle, or item ensures everyone in the department has real-time access to mission critical information. This functionality provides 24/7/365 information sharing capabilities. The NPD RMS is not configured to complete this type of task

RECOMMENDATION

Recommendation 6-3:

Initiate a CAD/RMS Replacement Project, in conjunction with the Technology Master Plan.

The procurement of any technology system should be based on technical and operational requirements as shown in Exhibit 6-3.

Exhibit 6-3

CAD/RMS Replacement Project Sequence

| Source: Created by Evergreen Solutions, January 2022. |
Examples of operational requirements for a CAD system may include:

- NG9-1-1 capable
- E9-1-1 and Phase II wireless support
- Integrated AVL for closest/fastest unit dispatching
- Multi-jurisdictional functionality for law enforcement, Fire and EMS
- Agency defined response plans
- Automatic address (geo-file) verification
- Integration with federal, state and local databases (i.e., Local warrants, State, NCIC)
- Information sharing capable: CAD-to-CAD, CAD-to-LE RMS, CAD-to-Fire/EMS RMS
- Highly configurable
- Windows navigation/GUI/mouse – Drag and drop
- Command line functionality
- Web application for real-time CAD incident information
- Integration with fire station alerting systems and group toning/paging
- Incident and status generated automatic notifications via text, email, etc.
- Incident and Unit status monitors

Examples technical requirements for a CAD system may include:

- Stable platform/guaranteed 99.999 percent uptime
- Virtualization for high availability and disaster recovery
- Scalable
- Industry standard SQL server
- CJIS security standards compliant
- Interface to other systems
- Agency defined permissions
- Role-based security profiles
- User friendly functionality and features

FISCAL IMPACT

The City will need external assistance for some topics which can be obtained through various methodologies that may or may not have a fiscal impact. The cost of a new CAD/RMS system will depend on numerous factors including the selected vendor, number of licenses required, etc. The potential cost range is from $750,000 to $1.5 million. For estimating purposes, Evergreen is assuming an initial cost of $1 million with $20,000 annually for support and maintenance.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initiate a CAD/RMS Project</td>
<td>($1,000,000)</td>
<td>($20,000)</td>
<td>($20,000)</td>
<td>($20,000)</td>
<td>($20,000)</td>
</tr>
</tbody>
</table>
FINDING

Neither the Police nor Fire Department employ a formal Quality Assurance/Quality Improvement (QA/QI) process to ensure data are timely, accurate, comprehensive, relevant and objective. As demonstrated by Exhibit 6-4, NPD Divisions operate in their own silos regarding incident report rules and requirements.

Exhibit 6-4
Operating Silos Regarding Incident Report Rules

<table>
<thead>
<tr>
<th>Patrol Division</th>
<th>Special Services Division</th>
<th>Detective Division</th>
<th>Data Entry</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Unique incident report rules</td>
<td>• Unique incident report rules</td>
<td>• Unique incident report rules</td>
<td>• Unique Incident Report rules</td>
</tr>
</tbody>
</table>

Source: Created by Evergreen Solutions, LLC, January 2022.

Quality data are required to measure outcomes and objectives and leverage technology.

All personnel expressed an interest in improving the ability to make data driven decisions and being able to trust system data. For reports to be credible and actionable, the underlying data must be correct. Personnel provided instances in which different people generated the same type of report but the data did not match.

For most departments, the quality of system data are directly related to the department’s culture. Departments that demand timely, accurate, comprehensive, relevant and objective information hold their personnel accountable to achieve established standards. Departments that do not end up with a mix of good and bad quality data which of course provides no measurable value to the department.

RECOMMENDATION

Recommendation 6-4:

Employ a Quality Assurance/Quality Information (QA/QI) process to achieve the desired standard or quality data, consistency of information, and consistency of operations.

A QA/QI initiative is a leadership-driven exercise. Department leadership mandates relevant data be used in decision-making processes. For personnel to trust the data, it is leadership’s responsibility to ensure the data are timely and accurate.
A QA/QI process should include:

- a central QA/QI assignment that reviews reports and information and provides a consistent message back to personnel when errors are found. (The central solution also provides the ability to quickly identify systemic problems, trends and patterns);
- random analysis by different department sections;
- remedial training for personnel who have difficulty meeting the standard; and
- leadership formally holding personnel accountable for the data they put into the system.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING**

Both the Police and Fire Departments require a user-friendly and streamlined solution to produce reports and dashboards.

Directly related to the Public Safety Technology Master Plan, a robust Business Intelligence/Analytics solution is required. The systems are not just about putting information in; they are equally about getting information out.

Both departments advised they struggle generating reports and dashboards. Police personnel keep an immense number of spreadsheets and other manual documents to generate reports. Each section essentially keeps their own set of statistics. They do this because personnel do not have the knowledge or training to generate reports from the CAD/RMS and Power BI system. Personnel could not estimate how much time they expend tracking information and generating reports but all agreed it was a lot of time.

**RECOMMENDATION**

Recommendation 6-5:

**Develop and implement a formal Business Intelligence/Analytics initiative to improve the capability for NPD and NFD personnel to leverage system data.**

A well-designed, configured, and implemented Business Intelligence/Analytics System is a workforce multiplier. However, a subject matter expert is required to fully leverage this type of system. This is not an IT role. Expertise in statistics, mathematics and BI/A systems is required. The subject matter expert (SME) should work with Police and Fire SMEs to develop and validate all reports.

**Exhibit 6-5** shows the major steps of a Business Intelligence/Analytics initiative.
Exhibit 6-5
Business Intelligence/Analytics Initiative Requirements

<table>
<thead>
<tr>
<th>Requirement</th>
</tr>
</thead>
<tbody>
<tr>
<td>An inventory of reports and dashboards that are required for all positions</td>
</tr>
<tr>
<td>and sections</td>
</tr>
<tr>
<td>An assessment to ensure all relevant data needed for the reports is being</td>
</tr>
<tr>
<td>captured</td>
</tr>
<tr>
<td>Ability to create automatic cyclical reports (e.g., Shift, daily, weekly,</td>
</tr>
<tr>
<td>weekend, monthly)</td>
</tr>
<tr>
<td>Ability to easily create ad-hoc reports</td>
</tr>
<tr>
<td>Ability to create sophisticated reports (e.g., forecasting)</td>
</tr>
</tbody>
</table>

Source: Created by Evergreen, January 2022.

FISCAL IMPACT

There is no fiscal impact if there is a City employee with Business Intelligence/Analytics expertise. However, the City may need to contract with an external SME if there are no City employees with the required knowledge, skills and abilities.

FINDING

Neither the Police nor Fire Department have a formal training curriculum for technology systems that include department policies, procedures, protocols and training aids (e.g., Cheat sheets, Frequent Asked Questions).

Personnel at both departments advised there is no formal standard for proficiency regarding the various technology systems. The value of each system is dependent on personnel using the system correctly in a time efficient manner. Personnel expressed frustration with the CAD/RMS and other systems. There was a wide range of abilities to use the systems from poor to average. No personnel advised they were experts with any system. A common statement was personnel “played around” with a system and learned how to do a specific task.

Personnel advised there was no enterprise-wide consistency of operation for how personnel used the primary systems. Personnel were trained differently depending on who trained them and when they were trained. It is neither time efficient nor operationally effective for personnel to be inept with assigned systems.

RECOMMENDATION

Recommendation 6-6:

Develop formal training curricula and training aids for all the primary systems (e.g., CAD/RMS).

Training curricula should be based on department policy and procedures. Trainers for each system should be established and trained to a level of proficiency. Training rules should be employed to ensure trainers do not stray from the formal training curricula. A department-wide
initiative should be employed to get all personnel to a proficient level with the current systems for the Department to achieve a level of consistency for both operations and information.

**Exhibit 6-6** illustrates the need for a formal training curriculum for each system and to ensure the training curricula include the relevant integration among systems.

**Exhibit 6-6**
Training Curriculums Based on Policy and Procedures for Each System

Source: Created by Evergreen, January 2022.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING**

There is no formal protocol for Police and Fire personnel to report technology system and hardware problems.

The City has a ticketing system to report IT-related issues; however, many personnel did not know about the system and/or do not use it. IT/Technical problems are reported via email, phone calls, and stopping a technician in the hallway/office.

The utilization of the City’s ticket system is important for the City to:

- quantify the IT support workload;
- identify the types of problems being reported
  - application
  - workstation
  - employee;
quickly address systemic issues once they are identified; and
prioritize IT support time.

RECOMMENDATION

Recommendation 6-7:

Develop and implement a policy and procedures for Police and Fire Department personnel to report technology issues.

Utilize the City’s existing IT ticket system and policy to report, prioritize and track all police and fire technology issues.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

6.2 COMBINED DISPATCH

The Combined Dispatch is the City of Norwalk’s Public Safety Answering Point (PSAP) for all emergencies (9-1-1) and all calls for service involving the Police and Fire Departments and the Norwalk Hospital that provides primary Emergency Medical Services (EMS) to the citizens of Norwalk. The Combined Dispatch Center is located in the Police Department facility and operates 24/7/365.

As shown in Exhibit 6-7, Combined Dispatch staff include one Lieutenant who manages the center, six supervisors, and 18 dispatchers.

Exhibit 6-7
Combined Dispatch Center Organizational Chart

Source: Compiled by Evergreen, January 2022.
The Combined Dispatch has a minimum staffing level of four positions:

- 9-1-1 Call Taker
- Fire/EMS Dispatcher
- Police Dispatcher
- Supervisor

**FINDING**

The Fire Department and EMS are not included in the formal governance structure of the Combined Dispatch Center.

The Combined Dispatch Center is a Police Department operation with nominal involvement from Fire and EMS. Both the Police and Fire Department management advised they were in the process of improving communication between the departments.

The Combined Dispatch Center has a direct impact on Fire and EMS operations including response times, allocation and deployment of resources, and command and control. The Fire Department should be included in all discussions and decisions regarding incidents that may require a Fire/EMS response. For example, NFD was not notified of a recent bomb hoax at a school. The development of school response plans should include Police, Fire and EMS.

**RECOMMENDATION**

Recommendation 6-8:

Establish a governance structure for the Combined Dispatch Center.

A common unified Public Safety Answering Point (PSAP) governance structure operates in the same manner as an Emergency Management Unified Command. Components include:

- Executive Steering Committee – Department executive leadership responsible for strategic direction, department collaboration, final decision-making authority, conflict resolution and budget decisions.

- Management Oversight Committee – Department command staff responsible for executing Executive Steering Committee direction, department collaboration and Combined Dispatch Center policies, procedures, workflows, and business processes.

- Combined Dispatch Center Director – Responsible for executing leadership direction and day-to-day operations.

- Operations Committees – Relevant personnel from each department responsible for providing input regarding Combined Dispatch Center operations:
  - Incidents that require a multi-discipline response – Police/Fire/EMS, Fire/EMS, Fire/Police, EMS/Police
- Single department incidents.

- Technology Committee – Relevant personnel from each department responsible for providing input regarding Combined Dispatch Center technology systems.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING**

The Police and Fire Departments advised there was no formal direction to ensure the Combined Dispatch Center received the maximum 10 points for the Insurance Services Office (ISO) rating.

As stated by the ISO:

*The ISO fire rating determines how well a fire department can protect a community and home. Insurance companies use the score to help set home insurance rates, as a home that is less likely to be severely damaged or destroyed by fire is cheaper to insure.*

**Exhibit 6-8** shows the major categories of an ISO score.

**Exhibit 6-8**

**ISO Score Factors**

<table>
<thead>
<tr>
<th>Percentage</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ten (10) percent</td>
<td>comes from the quality of the area’s emergency communications systems (911).</td>
</tr>
<tr>
<td>Fifty (50) percent</td>
<td>comes from the quality of your local fire department including staffing levels, training, and proximity of the firehouse.</td>
</tr>
<tr>
<td>Forty (40) percent</td>
<td>comes from availability of water supply, including the prevalence of fire hydrants and how much water is available for putting out fires.</td>
</tr>
</tbody>
</table>

*Source: Insurance Services Office (ISO), January 2022.*

The failure to achieve the best ISO score possible for the Emergency Communications Center (ECC) indicates potential ECC deficiencies and could have a minor negative impact on community insurance rates.

**RECOMMENDATION**

**Recommendation 6-9:**

**Incorporate ISO scoring into the Combined Dispatch Center’s primary objectives.**

Achieving the maximum ISO score for the Emergency Communications Center provided NPD and NFD leadership an actionable benchmark regarding the performance and capabilities of the
Combined Dispatch Center. The maximum score also has a role in potentially reducing community insurance rates.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

Minimum mandatory dispatch staffing is not based on a comprehensive staffing assessment.

The staff of the Combined Dispatch Center have managed the existing workload with the current staffing configuration. That said, some current operations are not aligned with PSAP industry best practices. For example:

- **9-1-1 Call Taking** – While there is a minimum of one dedicated Call Taker per shift, the Call Taker is often busy answering both 9-1-1 and non-emergency calls. The personnel working the Police and Fire/EMS Dispatch positions must often answer 9-1-1 calls when the workload is more than one Call Taker can manage. When this occurs, the Dispatchers must manage two life critical operations at the same time – 1. Focused attention on the 9-1-1 call, and 2. Focused attention on radio traffic and CAD activity. This is not ideal for life critical tasks. While the 9-1-1 workload can have peaks and valleys, it is a best practice to staff the Call Taker position to adequately manage known busy hour periods.

- The Call Taker also performs Emergency Medical Dispatch (EMD) protocols which includes correctly triaging the incident via asking numerous questions and providing lifesaving pre-arrival instructions. During a busy hour period of time, the Call Taker may rush through the EMD protocols to answer in-bound 9-1-1 calls.

There are numerous factors that can influence PSAP staffing including:

- Police, Fire and EMS strategic goals, objectives, and initiatives
- PSAP, Police, Fire and EMS Concept of Operations – Workflows and business processes
- Police, Fire and EMS expectations
- Community expectations
- Allocation and deployment of resources
- Leveraging technology systems to be better, smarter, faster, and safer
- APCO, NENA and NFPA standards, guidelines, and best practices the City is committed to achieving
- Minimum mandatory performance metrics (e.g., APCO, NENA, NFPA)
- PSAP workload
  - 9-1-1, 10-digit emergency and non-emergency calls
  - Outbound workload
  - Number of Police, Fire and EMS staff working
  - Radio system traffic
• Breakdown of workload
  – Time of Year (e.g., Winter, Spring, Summer and Fall)
  – Month
  – Day of Week
  – Time of Day
  – Type of incident – Life critical, emergency, non-emergency
  – Workload trends and patterns;
• Quality Assurance Program and training:
  – PSAP environment (e.g., Break person is included in minimum mandatory staffing)

RECOMMENDATION

Recommendation 6-10:

Complete a formal PSAP staffing assessment based on all relevant factors.

Evergreen found no immediate evidence that staffing is insufficient or inappropriate; however, the Combined Dispatch Center is responsible for life critical operations which requires the highest standard of care. To successfully complete life critical operations in an operationally effective and time efficient manner, precise goals, objectives and performance metrics must be developed by all relevant stakeholders. Establishing goals, objectives and performance metrics will have a direct impact on Combined Dispatch Center minimum mandatory staffing requirements.

FISCAL IMPACT

Without a complete assessment, the number and type of positions that may be needed cannot be determined. This recommendation can be implemented with existing resources.

FINDING

The Combined Dispatch Center does formally employ Association of Public-Safety Communications Officials (APCO), National Emergency Number Association (NENA) and National Fire Protection Association (NFPA) standards, guidelines, and best practices.

Exhibit 6-9 provide examples of the various standards.
Exhibit 6-9
Examples of Standards

<table>
<thead>
<tr>
<th>APCO/NENA Call Answer Priority and Call Handling Guideline</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Order of Answering Priority.</strong> It is the responsibility of on duty telecommunicators to answer all in-coming calls. All phone calls will be answered in order of priority. 1st priority will be the 9-1-1 and emergency 7/10-digit phone lines; 2nd priority will be non-emergency lines and 3rd priority will be the administrative and/or internal phone lines.</td>
</tr>
<tr>
<td><strong>Standard for information gathering.</strong> The telecommunicator will obtain the basic information from the caller. At a minimum, this information should include: the address or exact location of the incident, call back number, type of emergency, time of occurrence, hazards, identity of those involved and their location.</td>
</tr>
<tr>
<td><strong>Transferring emergency calls.</strong> When emergency calls need to be transferred to another PSAP, the telecommunicator will transfer the call without delay. The telecommunicator will advise the caller: “Please do not hang up; I am connecting you with (name of the agency).” The telecommunicator should stay on the line until the connection is complete and all pertinent information has been relayed to the answering PSAP.</td>
</tr>
<tr>
<td><strong>Abandoned calls/disconnects.</strong> The telecommunicator will attempt a call back when a 9-1-1 call is routed to the PSAP and the call disconnects before the telecommunicator can determine if assistance is needed. The telecommunicator will call the number back once to make this determination. If the phone is busy or there is no answer, additional attempts to contact the caller will not be made by the telecommunicator. If the callback attempt goes to voice mail, no message will be left.</td>
</tr>
<tr>
<td><strong>Response to abandoned calls.</strong> In the event a call is abandoned or disconnected before the telecommunicator can determine if emergency assistance is needed, a police unit will be dispatched to the location indicated by the PSAP display (ALI).</td>
</tr>
</tbody>
</table>

**NFPA 1710 – Fire and EMS Departments**

| 3.3.53.1 Alarm Answering Time. The time interval that begins when the alarm is received at the communication center and ends when the alarm is acknowledged at the communication center. |
| 3.3.53.2 Alarm Handling Time. The time interval from the receipt of the alarm at the primary PSAP until the beginning of the transmittal of the response information via voice or electronic means to emergency response facilities (ERFs) or the emergency response units (ERUs) in the field. |
| 3.3.53.3 Alarm Processing Time. The time interval from when the alarm is acknowledged at the communication center until response information begins to be transmitted via voice or electronic means to emergency response facilities (ERFs) and emergency response units (ERUs). |
| 3.3.53.4 Alarm Transfer Time. The time interval from the receipt of the emergency alarm at the PSAP until the alarm is first received at the communication center. |

*Source: APCO, NFPA, January 2022.*

Exhibit 6-10 demonstrates all steps of a response time metric. NPD and NFD should measure key steps in the process and milestone phases (e.g., combined steps) to identify strengths and opportunities for improvement.
There are no minimum mandatory performance metrics to measure the quality of Combined Dispatch Center operations. Public Safety industry established performance metrics provide NPD and NFD leadership action information regarding:

- operational effectiveness and time efficiency of workflows, business processes, and protocols;
- ability to precisely measure each step in a workflow (e.g., regarding Call Taking/Dispatching).
  - 9-1-1 call answer time
  - Incident processing time
  - Dispatch queue time
  - Unit acknowledgment time
  - Unit enroute time
  - Unit arrived on scene time
  - Total response time – 9-1-1 call to units arrive on scene;

- ability to complete comparative analysis against established benchmarks;
- ability to identify trends, patterns and anomalies; and
- ability to measure coverage, allocation and deployment of resources.

**RECOMMENDATION**

Recommendation 6-11:

**Incorporate minimum mandatory performance metrics to accurately evaluate Combined Dispatch Center operations.**
The metrics should be based on industry standards and guidelines such as those provided in the examples above.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

### 6.3 POLICE DEPARTMENT

The Norwalk Police Department was organized in October 1913 following an election by which the former cities of Norwalk and South Norwalk were consolidated into the present City of Norwalk. The new Department succeeded the original department and constabulary that had previously existed. From 1913 to 1927, the Department was under control of the Common Council, one member of which was Chairman of the Police Committee. In 1927, the Board of Public Safety was created and took over the management of both Police and Fire Departments

The population of the City of Norwalk as of 2020 is approximately 91,000. The following are some City demographic factors that can have an impact on public safety operations:

- Approximately 30 percent of Norwalk’s population is 25 years of age or under and 65 percent under 44 years old. This demographic can require special attention, especially the segment in the formative and adolescent years.

- The City has a 15.4 percent senior population (e.g., people 65+ years of age). Seniors often represent a major demand for social services, including police services. In addition to responding to ‘crimes against the elderly’ this population generally increases demand for medical responses and general police service such as lift-assists, lockouts, etc.

- The City has a robust service population. Thousands of people come from not only the surrounding communities, but also from the New York region to attend Norwalk’s many restaurants, cafes, nightclubs and entertainment spots as well as Maritime Aquarium at Norwalk and Norwalk’s public beach.

- The City has numerous year-round special events that require extra police staffing.

The Mission Statement of the Norwalk Police Department is:

> It is the mission of the Norwalk Police Department to provide quality service to a diverse community through a culture of bias free policing; to hire and promote talented officers and a professional staff with the courage and desire to serve and protect our community; and to promote a cooperative spirit in which police officers and citizens work together to promote a safe environment.

The Department has a total of 219 personnel with 182 being sworn officers. As illustrated in **Exhibit 6-11**, the Department is organized into two divisions – Operations and Administration.
Exhibit 6-11
Norwalk Police Department Organizational Chart

Source: Norwalk Police Department, 2022.
The Department has been Commission on Accreditation for Law Enforcement Agencies (CALEA) accredited since 1995 and in 2021 completed a re-accreditation process. CALEA was created in 1979 as a credentialing authority through the joint efforts of law enforcement’s major executive associations. The CALEA Accreditation program seals are reserved for use by those public safety agencies that have demonstrated compliance with CALEA Standards and have been awarded CALEA Accreditation by the Commission.

Exhibit 6-12 shows the Police Officers Per 1,000 population ratio. The ratios range from 1.51 to 3.23; Norwalk PD is 1.94. The mean of the listed cities is 1.99. The median is 1.83. New Haven PD is an outlier with 3.23 ratio. If New Haven was removed from the calculation the new mean is 1.88 and median is 1.81.

<table>
<thead>
<tr>
<th>City</th>
<th>2020 Population</th>
<th>#Municipal Sworn Officers per 1000 people</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk, CT</td>
<td>91,184</td>
<td>1.94</td>
</tr>
<tr>
<td>Newton, MA</td>
<td>88,923</td>
<td>1.63</td>
</tr>
<tr>
<td>Lynchburg, VA</td>
<td>79,009</td>
<td>2.10</td>
</tr>
<tr>
<td>Nashua, NH</td>
<td>91,322</td>
<td>1.86</td>
</tr>
<tr>
<td>Cranston, RI</td>
<td>82,934</td>
<td>1.80</td>
</tr>
<tr>
<td>Longmont, CO</td>
<td>98,885</td>
<td>1.71</td>
</tr>
<tr>
<td>Framingham, MA</td>
<td>72,362</td>
<td>1.81</td>
</tr>
<tr>
<td>Santa Barbara, CA</td>
<td>88,665</td>
<td>1.51</td>
</tr>
<tr>
<td>Stamford, CT</td>
<td>135,470</td>
<td>2.07</td>
</tr>
<tr>
<td>New Haven, CT</td>
<td>134,023</td>
<td>3.23</td>
</tr>
<tr>
<td>Waterbury, CT</td>
<td>114,403</td>
<td>2.56</td>
</tr>
<tr>
<td>Danbury, CT</td>
<td>86,518</td>
<td>1.73</td>
</tr>
<tr>
<td>Average (w/o Norwalk)</td>
<td>97,501</td>
<td>2.00</td>
</tr>
</tbody>
</table>


Exhibits 6-13 and 6-14 contain crime statistics for peer cities and the region; however, as noted below, the FBI warns against attempts to rank cities using these data alone.

Exhibit 6-13 contains crime statistics for peer cities and the region; however, as noted below, the FBI warns against attempts to rank cities using these data alone.

<table>
<thead>
<tr>
<th>City</th>
<th>Population</th>
<th>Violent Crime</th>
<th>Murder And Nonnegligent Manslaughter</th>
<th>Rape</th>
<th>Robbery</th>
<th>Aggravated Assault</th>
<th>Property Crime</th>
<th>Burglary</th>
<th>Larceny-Theft</th>
<th>Motor Vehicle Theft</th>
<th>Arson</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk</td>
<td>89,440</td>
<td>183</td>
<td>1</td>
<td>8</td>
<td>29</td>
<td>145</td>
<td>1,247</td>
<td>133</td>
<td>989</td>
<td>125</td>
<td>4</td>
</tr>
<tr>
<td>Danbury</td>
<td>85,167</td>
<td>97</td>
<td>1</td>
<td>15</td>
<td>28</td>
<td>53</td>
<td>1,045</td>
<td>132</td>
<td>827</td>
<td>86</td>
<td>4</td>
</tr>
<tr>
<td>New Haven</td>
<td>130,494</td>
<td>1,168</td>
<td>13</td>
<td>45</td>
<td>321</td>
<td>789</td>
<td>4,958</td>
<td>659</td>
<td>3,580</td>
<td>719</td>
<td>28</td>
</tr>
<tr>
<td>Stamford</td>
<td>130,678</td>
<td>264</td>
<td>5</td>
<td>5</td>
<td>87</td>
<td>145</td>
<td>1,803</td>
<td>196</td>
<td>1,446</td>
<td>161</td>
<td>1</td>
</tr>
<tr>
<td>Waterbury</td>
<td>107,812</td>
<td>325</td>
<td>5</td>
<td>53</td>
<td>124</td>
<td>143</td>
<td>3,263</td>
<td>450</td>
<td>2,272</td>
<td>541</td>
<td>12</td>
</tr>
<tr>
<td>Average</td>
<td>113,538</td>
<td>464</td>
<td>6</td>
<td>35</td>
<td>140</td>
<td>283</td>
<td>2,767</td>
<td>359</td>
<td>2,031</td>
<td>377</td>
<td>11</td>
</tr>
</tbody>
</table>

Exhibit 6-14
Comparison of Fairfield Regional Crime Statistics

<table>
<thead>
<tr>
<th>City</th>
<th>Population</th>
<th>Violent Crime</th>
<th>Murder And Nonnegligent Manslaughter</th>
<th>Rape</th>
<th>Robbery</th>
<th>Aggravated Assault</th>
<th>Property Crime</th>
<th>Burglary</th>
<th>Larceny-Theft</th>
<th>Motor Vehicle Theft</th>
<th>Arson</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk</td>
<td>89,440</td>
<td>183</td>
<td>1</td>
<td>8</td>
<td>29</td>
<td>145</td>
<td>1,247</td>
<td>133</td>
<td>989</td>
<td>125</td>
<td>4</td>
</tr>
<tr>
<td>Bridgeport</td>
<td>144,908</td>
<td>813</td>
<td>17</td>
<td>71</td>
<td>392</td>
<td>363</td>
<td>2465</td>
<td>555</td>
<td>1292</td>
<td>618</td>
<td>13</td>
</tr>
<tr>
<td>Danbury</td>
<td>85,167</td>
<td>97</td>
<td>1</td>
<td>15</td>
<td>28</td>
<td>53</td>
<td>1045</td>
<td>132</td>
<td>827</td>
<td>86</td>
<td>4</td>
</tr>
<tr>
<td>Fairfield</td>
<td>62,239</td>
<td>31</td>
<td>1</td>
<td>3</td>
<td>13</td>
<td>14</td>
<td>941</td>
<td>96</td>
<td>791</td>
<td>54</td>
<td>0</td>
</tr>
<tr>
<td>Greenwich</td>
<td>62,9045</td>
<td>22</td>
<td>0</td>
<td>4</td>
<td>4</td>
<td>14</td>
<td>471</td>
<td>65</td>
<td>348</td>
<td>58</td>
<td>0</td>
</tr>
<tr>
<td>Newtown</td>
<td>27,795</td>
<td>6</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>5</td>
<td>57</td>
<td>11</td>
<td>45</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Ridgefield</td>
<td>25,050</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>72</td>
<td>12</td>
<td>53</td>
<td>7</td>
<td>0</td>
</tr>
<tr>
<td>Shelton</td>
<td>41,287</td>
<td>22</td>
<td>0</td>
<td>8</td>
<td>7</td>
<td>7</td>
<td>304</td>
<td>61</td>
<td>219</td>
<td>24</td>
<td>1</td>
</tr>
<tr>
<td>Stamford</td>
<td>130,678</td>
<td>264</td>
<td>5</td>
<td>27</td>
<td>87</td>
<td>145</td>
<td>1803</td>
<td>196</td>
<td>1446</td>
<td>161</td>
<td>1</td>
</tr>
<tr>
<td>Stratford</td>
<td>52,034</td>
<td>71</td>
<td>1</td>
<td>13</td>
<td>25</td>
<td>32</td>
<td>859</td>
<td>97</td>
<td>654</td>
<td>108</td>
<td>4</td>
</tr>
<tr>
<td>Trumbull</td>
<td>35,772</td>
<td>45</td>
<td>0</td>
<td>7</td>
<td>15</td>
<td>23</td>
<td>778</td>
<td>53</td>
<td>692</td>
<td>33</td>
<td>1</td>
</tr>
<tr>
<td>Westport</td>
<td>28,332</td>
<td>4</td>
<td>0</td>
<td>0</td>
<td>2</td>
<td>2</td>
<td>193</td>
<td>20</td>
<td>152</td>
<td>21</td>
<td>0</td>
</tr>
</tbody>
</table>


FINDING

While staffing has significantly improved compared to previous years, there are opportunities to further streamline the process.

At the time of this report, NPD had 18 vacant sworn positions. The number of vacant sworn positions is having a significant impact on NPD operations as personnel have been transferred from various NPD sections to Patrol to maintain adequate Patrol staffing. For example, the School Resource Officer (SRO) Unit normally has nine sworn positions and is down to three SROs covering 19 public schools and one charter school. The reduced staffing does not allow the SRO Unit to complete normal assignments, such as school-related investigations and school security tasks. Additionally, some SRO programs such as DARE and Encore are not fully executed.

The reduced SRO staffing can also negatively impact NPD’s response to an incident at a school. For example:

- delayed response to a school that does not have an SRO present (e.g., A Patrol unit is assigned the incident and responds to the school); and
- delayed NPD/School communication if an SRO is not present to directly communicate with the Principal, Assistant Principal or Teacher who is reporting the incident.

Exhibits 6-15 and 6-16 are excerpts from the Department’s September 2021 Duty Roster that show the various sections that personnel were temporally reassigned to Patrol due to the staffing shortage.
Law enforcement agencies nationwide are suffering for staffing shortages for a variety of reasons, including COVID-19 and attitudes towards law enforcement in general. The Police and Sheriff Departments must compete against each other to attract good candidates from a smaller pool of applicants.

An additional problem is the length of time required to hire a new applicant and process them through the State Police Academy and the Department’s Field Training Officer program. It can
take 13 to 14 months before a new sworn person can be assigned to Patrol and provide substantive value to the department.

Finally, NPD is allocated a limited number of positions in each of the three State Police Academy classes that are held each year. This means it could take NPD multiple years to achieve 100 percent sworn staffing.

The Department completed a formal Workload Assessment and Staffing initiative in April 2020 to address the staffing shortage. Numerous aspects of the initiative have improved the staffing situation. For example:

- Previously, NPD would fill vacant sworn positions every two years. Now, there is a consistent hiring cycle.
- NPD is attempting to target certified Connecticut officers to apply to NPD.
- NPD recently joined the Connecticut Police Chiefs Association Statewide Officer Exam program which provides applicants the ability to apply and pass state required tests in a more timely and streamlined manner.
- NPD has attempted to expedite the steps in the hiring process.

RECOMMENDATION

Recommendation 6-12:

Establish a comprehensive plan to further streamline the Police hiring and training process.

Examples for improvement include:

- The department is placing three new hires into the next academy class but had five “seats” allocated. There should be a formal department plan that ensures all academy class seats assigned to NPD will be filled.

- The internal process including an interview with executive staff, polygraph and background investigation can take two to three months. The time required to process an applicant should be reduced.

- Applicant background investigations are assigned to detectives that already have a significant case load. NPD should consider assigning a single detective to complete the background investigations full time during a hiring process and/or employ retired sworn personnel on a temporary basis to complete new applicant background investigations.

Exhibit 6-17 provides a summary example of steps that should be included in a Master Hiring Plan.

FISCAL IMPACT

This recommendation can be implemented with existing resources.
Exhibit 6-17
Master Hiring Plan Example Tasks

<table>
<thead>
<tr>
<th>Academy Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Academy class reserved positions</td>
</tr>
<tr>
<td>○ Academy Class #1, Academy Class #2, Academy Class #3</td>
</tr>
<tr>
<td>• Process to achieve reserved positions for each academy class</td>
</tr>
<tr>
<td>• Milestone dates to achieve reserved positions for each academy class</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Master Hiring Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Recruitment</td>
</tr>
<tr>
<td>• Police Chiefs Association Officer Exam</td>
</tr>
<tr>
<td>○ Monthly process</td>
</tr>
<tr>
<td>○ Connecticut certified police officer</td>
</tr>
<tr>
<td>○ Non-certified police officer</td>
</tr>
<tr>
<td>• NPD applicants</td>
</tr>
<tr>
<td>• Review process</td>
</tr>
<tr>
<td>○ Police Chief interview process</td>
</tr>
<tr>
<td>○ Polygraph</td>
</tr>
<tr>
<td>○ Background</td>
</tr>
<tr>
<td>• Pre-conditional offer</td>
</tr>
<tr>
<td>• Hire date</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Background Investigation</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Establish a streamlined process that can be completed in X time frame for each academy class</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Field Training Officer Program</th>
</tr>
</thead>
<tbody>
<tr>
<td>• 12-to-14-week FTO program</td>
</tr>
</tbody>
</table>

Source: Created by Evergreen Solutions, January 2022.

FINDING

The quality of Patrol Incident Reports could be improved.

Detectives call victims and witnesses of crimes and ask the same exact questions the Patrol Officer asked. This is an unnecessary duplicate activity that is completed to ensure the appropriate questions were asked. There is not a 100 percent trust regarding the quality of investigation completed by all Patrol Officers.

Additionally, Detective Bureau staff are routinely called by Patrol personnel on scene as asked basic investigative questions. The Department does not employ a checklist for all types of crimes to ensure Patrol personnel complete a quality investigation and document all relevant information.

RECOMMENDATION

Recommendation 6-13:

Develop comprehensive checklists for all major crimes for Patrol personnel to use as a guide to complete on-scene investigations.

No Police Officer can remember every question to ask for every type of crime. The checklist should be crime specific and include the appropriate sequence of tasks, questions to ask victims and witnesses, crime scene search techniques, crime analysis information, and solvability factors.
The implementation and training of the checklists will:

- improve the quality of Patrol on-scene investigations;
- streamline Patrol on-scene investigations;
- improve the overall ability of Patrol personnel to complete on-scene investigations;
- achieve Consistency of Operations and Consistency of Information;
- improve the quality of Patrol incident reports;
- eliminate the need for detectives to automatically re-question victims and witnesses. (Note: Detectives should make contact with victims and witnesses to provide their contact information and ask for any new information); and
- improve the ability for the Detective Bureau to leverage crime analysis information and solvability factors.

**Exhibit 6-18** provides an excerpt example of a property crime checklist.

### Exhibit 6-18
**Excerpt from Property Crime Investigation Checklist Example**

**CRIME SCENE**
- Document the crime scene as you found it.
- Identify witnesses and obtain statements.
- Broadcast a detailed suspect description and update if more information becomes available.
- Note points of entry, exit and flight.
- Note force used to enter a property or vehicle.
- Note the location of broken glass.
- Check glass for blood (DNA) or fingerprints.
- Check points of entry for tool marks and look for tools used.
- Look for gas cans or other accelerants in the case of arson.
- Check the location for other possible points of contact by the suspect, as suspects have been known to eat, drink and use the bathroom.
- Determine what was stolen or damaged.
- Ask yourself: “Who would benefit from committing this crime?” Was this simply a crime of opportunity or was the victim targeted?
- Be diligent at the crime scene and consider all possible evidentiary avenues.
- Recognize you usually only get one shot at processing a scene before it is tainted.
- Ensure all collected items of evidence (fingerprints, blood, clothing, tools, tool marks, shoe impressions, gas cans and accelerants, food and food packaging) are submitted for analysis.

**GET DETAILED LIST OF STOLEN OR DESTROYED PROPERTY**
- A detailed description of the stolen/destroyed property or vehicle is key to bolstering the possibility of property or damage recovery.
- Prioritize serialized property or property with unique markings or descriptors.
- Place all stolen serialized property into NCIC.
- Be particularly detailed when describing non-serialized property – include defects and unique identifiers if any are known.
- Try and obtain photos of stolen property or vehicles.
- Share all the information at roll call for at least three days. This way, officers who have been off for a couple of days can learn of the crime, and it will remain fresh in the mind of working officers so they remain on the lookout or you find another officer may have responded to a similar call for service.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

There is no person assigned as a formal Crime Analyst.

NPD is divided into numerous silos that are focused on their primary assignment. Personnel agreed the following were occurring:

- different Detectives and officers could be investigating the same suspect or address/location and not know other department personnel are doing the same;
- an incident report may contain information regarding a method of operation, trend, pattern or investigative lead for another investigation;
- trends, patterns and frequent flyers are not readily identified the second and third time they occur; and
- personnel are doing their best to investigate their cases and do not have time to look if there are any connections to other cases citywide.

RECOMMENDATION

Recommendation 6-14:

Evaluate the options to assign a sworn or civilian staff as a Crime Analyst.

The objective of this position to assist the Department in working smarter and more efficiently. A person with the right knowledge, skills and abilities, and access to appropriate technology systems can provide a significant benefit to the Department.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The Department utilizes on duty Patrol personnel to fill vacant School Crossing Guard positions.

The Community Policing Unit is responsible for the management if School Crossing Guards. The Department has had difficulty filling School Crossing Guard positions due to COVID-19 and other circumstances. It is Department policy to utilize an on-duty Patrol officer to fill any vacant School Crossing Guard position.
While it is understood why Patrol personnel are utilized for the School Crossing Guard task, it is not an efficient and effective utilization of Patrol personnel. The assignment reduces the coverage and response capabilities of Patrol to life critical and urgent incidents. The City is also paying a higher rate to staff a School Crossing Guard position.

RECOMMENDATION

Recommendation 6-15:

Develop an Action Plan to adequately fill School Crossing Guard positions.

The Department should collaborate with school personnel, parents and other relevant community groups to identify potential solutions for this issue.

FISCAL IMPACT

Once the positions are filled, there should be significant savings based on the difference between the salary and benefits provided to a Crossing Guard and a Sworn Officer.

FINDING

The digital evidence workload is steadily increasing and may require additional staffing to ensure coverage in the near future.

A detective of the Special Victims Unit (SVU) manages a normal SVU workload (e.g., child abuse, child molestation) and is also responsible for all department investigations that seize computers, laptops, phones and hard drives. This position serves on a statewide child pornography task force. The investigation of digital evidence for the entire Department is mission critical to solving criminal cases and successfully prosecuting defendants, and it appears that the workload is becoming too large to complete both assignments in a timely and professional manner.

RECOMMENDATION

Recommendation 6-16:

Complete a staffing assessment to ascertain whether a full-time Digital Evidence Detective is needed.

While no formal data regarding the workload of this position was provided, interview information revealed this position is operating beyond maximum capacity for the digital evidence assignment alone.

The workload for this assignment will increase over time. NPD needs to evaluate the ability to remove SVU tasks from this position to provide more bandwidth for digital evidence investigations. Another option might be to allocate one of the vacant positions for this purpose.
FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

NPD has not formalized the implementation of the RollKall extra work software application to improve the efficiency of extra work assignments.

At the time of this report there was a discussion regarding the utilization of the RollKall application for extra work assignments which was purchased in 2021 and partially implemented.

The previous process required NPD officers to physically be at NPD headquarters on a Friday afternoon to obtain an extra work assignment. RollKall is an application that allows administrators to schedule and assign extra work assignments, easily manage and fill call-offs, and track all hours and job details. There are also features that allow for the tracking and billing of hours to outside organizations using NPD services, when appropriate.

Continuing to manually assign and track extra duty is not time efficient or conducive to a positive work environment.

RECOMMENDATION

Recommendation 6-17:

Implement the RollKall application and related procedures.

NPD should work with the Comptroller to establish processes for billing outside organizations that use off duty police services.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

NPD has not fully assessed the level of effort required for certain mandatory tasks, and consequently may not be able to plan ahead to sustain state requirements.

The Department has not completed a Total Cost of Ownership assessment for critical positions. The State just mandated the utilization of in-car camera systems in addition to BWCs so the workload will increase.

A Total Cost of Ownership (TCO) includes an assessment of:

- all relevant initial and recurring costs;
level of effort to complete the assignment/task; and
alternative options to complete the assignment/task.

For example, NPD has a Lieutenant completing requests for Body Worn Camera (BWC) videos. This includes responding to:

- District Attorney;
- criminal court system requests;
- civil court requests; and
- Freedom of Information requests.

The workload is significant and will only increase with the implementation of the state-mandated In-Car Video system. There is no legislation that requires a sworn Lieutenant to complete this task.

Exhibit 6-19 gives an example of an estimate of the total cost for a body worn camera system.

<table>
<thead>
<tr>
<th>Cloud Storage</th>
<th>Year 1/Initial Costs</th>
<th>Costs Years 1-3</th>
<th>Costs Years 1-5</th>
</tr>
</thead>
<tbody>
<tr>
<td>BWC Components (system)</td>
<td>$1,114,000</td>
<td>$2,218,000</td>
<td>$3,322,000</td>
</tr>
<tr>
<td>Recurring Costs (licenses, supplies)</td>
<td>$552,000</td>
<td>$1,656,000</td>
<td>$2,760,000</td>
</tr>
<tr>
<td>Included in line above</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cloud Storage (recurring costs)</td>
<td>$255,000</td>
<td>$765,000</td>
<td>$1,275,000</td>
</tr>
<tr>
<td>ISP to/from Cloud (recurring)</td>
<td>$7,200</td>
<td>$21,600</td>
<td>$36,000</td>
</tr>
<tr>
<td>Infrastructure Costs</td>
<td>$488,000</td>
<td>$488,000</td>
<td>$488,000</td>
</tr>
<tr>
<td>Network</td>
<td>$30,000</td>
<td>$30,000</td>
<td>$30,000</td>
</tr>
<tr>
<td>Report Room</td>
<td>$10,000</td>
<td>$10,000</td>
<td>$10,000</td>
</tr>
<tr>
<td>Installation</td>
<td>$7,800</td>
<td>$7,800</td>
<td>$7,800</td>
</tr>
<tr>
<td><strong>Infrastructure Subtotal</strong></td>
<td><strong>$543,000</strong></td>
<td><strong>$557,400</strong></td>
<td><strong>$571,800</strong></td>
</tr>
<tr>
<td><strong>Total System/Infrastructure Costs</strong></td>
<td><strong>$1,657,000</strong></td>
<td><strong>$2,775,400</strong></td>
<td><strong>$3,893,800</strong></td>
</tr>
</tbody>
</table>

| Personnel Costs               |                       |                 |                 |
| BWC System Administrator – 1 FTE* | $97,335               | $300,853        | $516,765        |
| (base salary = $70,000)       |                       |                 |                 |
| BWC Public Records Analyst – 1 FTE* | $78,191               | $241,680        | $415,125        |
| (Base Salary = $56,232)       |                       |                 |                 |
| Court System Discovery Liaison - 1 FTE* | $78,191               | $241,680        | $415,125        |
| (Base Salary = $56,232)       |                       |                 |                 |
| QA/QI Lieutenant – 1 FTE*     | $190,499              | $588,812        | $1,011,383      |
| (Base Salary = $137,000)      |                       |                 |                 |
| Network Administrator – 1 FTE*| N/A                   | N/A             | N/A             |
| (Base Salary = $56,232)       |                       |                 |                 |
| **Total Personnel Costs**     | **$444,216**          | **$1,373,021**  | **$2,358,398**  |

**TOTAL COSTS** | **$2,101,216** | **$4,148,421** | **$6,252,198**

Source: Created by Evergreen, January 2022.
As demonstrated in the exhibit, the objective is to identify all costs, personnel requirements, and level of effort to provide leadership actionable information regarding what is required to successfully employ and manage a system.

RECOMMENDATION

Recommendation 6-18:

Complete a Total Cost of Ownership assessment regarding the management of BWC/In-Car Camera videos.

Potentially, a more effective and efficient method of handling the requests would be to assign the work to a position below the rank of Lieutenant which could save money for the Department while still providing equivalent services.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

6.4 FIRE DEPARTMENT

The history of the Norwalk Fire Department stretches back to the late 1770s, when British troops set fire to Norwalk. Since then, the Department has had a long history of establishing organized firefighting through volunteers and eventually employees.

The Fire Department responds to a wide array of incidents including:

- Motor vehicle accidents
- Structure fires
- Hazardous Materials
- High angle and confined rescues
- Water and ice emergencies
- Fire Prevention
- Fire Marshal’s Office
- Emergency Management
- Apparatus Maintenance

In 2000, the Fire Department began responding to emergency medical calls as a designated first responder. This additional responsibility doubled the number of calls to which the department responded. Because of the strategic locations of the City's fire stations, dispatching a fire truck to life-threatening situations allowed firefighters to be on scene quickly to stabilize the situation until ambulance arrival. In 2021, the breakdown of Fire and EMS incidents was Fire-46 percent and EMS-54 percent.

Norwalk firefighters, who are trained as either Emergency Medical Technicians (EMTs) or Medical Response Technicians (MRTs), work closely with Norwalk Hospital paramedics on a daily basis.
The Norwalk Fire Department’s Mission Statement reads:

...to save lives and protect property through the collective efforts of each and every member of the Norwalk Fire Department. The Norwalk Fire Department will apply its educational, suppression, prevention and emergency management efforts toward that end. We will make a daily commitment to each member that his or her safety in this very dangerous profession is the first concern of each officer of this Department. All training and emergency scene operations will have firefighter safety as a key component

Exhibit 6-20 shows the NFD organizational structure.

Exhibit 6-20
Norwalk Fire Department Organization Chart

Source: Norwalk Police Department, February 2022..
The City budget document states:

The City provides complete fire prevention and suppression services through its professional full-time Fire Department, which consists of 143 sworn fire personnel, supplemented by five civilian employees. The Department operates out of five fire stations strategically located throughout the community and maintains a rotating fire apparatus replacement schedule through their capital budget. In addition to fire suppression services the Department is a key resource for the Regional Hazardous Materials Response Team. The Department also collaborates with the Norwalk Police Department in Arson Investigations and with the Marine Division. The Fire Prevention Division is responsible for the enforcement of the State Life Safety and Fire Codes with a staff of nine employees. The Office of Emergency Management is a division within the Fire Department. This division is responsible for emergency preparedness planning as well as the operation and maintenance of an Emergency Operations Center for local and national emergencies. The Fire Department is also a first responder for medical emergencies.

Exhibit 6-21 shows Firefighters Per 1,000 Population Ratio. The ratios range from 0.82 to 2.81. The Norwalk Fire Department is 1.40. The mean of the listed cities is 1.94; the median is 2.05.

### Exhibit 6-21

Comparison of Fire Fighters per 1000 Population Ratio

<table>
<thead>
<tr>
<th>City</th>
<th>2020 Population</th>
<th># Fire Fighters per 1000 people</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk, CT</td>
<td>91,184</td>
<td>1.40</td>
</tr>
<tr>
<td>Newton, MA</td>
<td>88,923</td>
<td>2.09</td>
</tr>
<tr>
<td>Lynchburg, VA</td>
<td>79,009</td>
<td>2.24</td>
</tr>
<tr>
<td>Nashua, NH</td>
<td>91,322</td>
<td>1.93</td>
</tr>
<tr>
<td>Cranston, RI</td>
<td>82,934</td>
<td>2.42</td>
</tr>
<tr>
<td>Longmont, CO</td>
<td>98,885</td>
<td>0.82</td>
</tr>
<tr>
<td>Framingham, MA</td>
<td>72,362</td>
<td>2.05</td>
</tr>
<tr>
<td>Santa Barbara, CA</td>
<td>88,665</td>
<td>2.41</td>
</tr>
<tr>
<td>Stamford, CT</td>
<td>135,470</td>
<td>1.76</td>
</tr>
<tr>
<td>New Haven, CT</td>
<td>134,023</td>
<td>2.81</td>
</tr>
<tr>
<td>Waterbury, CT</td>
<td>114,403</td>
<td>2.05</td>
</tr>
<tr>
<td>Danbury, CT</td>
<td>86,518</td>
<td>1.39</td>
</tr>
<tr>
<td><strong>Average (w/o Norwalk)</strong></td>
<td><strong>97,501</strong></td>
<td><strong>2.00</strong></td>
</tr>
</tbody>
</table>

Source: Created by Evergreen, LLC., January 2022.

Exhibit 6-22 shows a breakdown of National Fire Incident Report System (NFIRS) data for the Connecticut comparison cities.
### Exhibit 6-22
Comparison of NFIRS Summary of Calls by City
Summary by Incident Type
Report Period From 01/01/2019 to 12/31/2019

<table>
<thead>
<tr>
<th>City</th>
<th>Frequency</th>
<th>% of Total Calls</th>
<th>Mutual Aid Non</th>
<th>Mutual Aid Given</th>
<th>Mutual Aid Received</th>
<th>Other Aid Given</th>
<th>Invalid Aid Flag</th>
<th>Exposures</th>
<th>Total Incidents-Fires, Rescues, False Calls</th>
</tr>
</thead>
<tbody>
<tr>
<td>Danbury</td>
<td>2,745</td>
<td>100%</td>
<td>2,745</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2,746</td>
</tr>
<tr>
<td>New Haven</td>
<td>19,781</td>
<td>100%</td>
<td>19,773</td>
<td>3</td>
<td>6</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>19,784</td>
</tr>
<tr>
<td>Norwalk</td>
<td>7,187</td>
<td>100%</td>
<td>7,173</td>
<td>25</td>
<td>14</td>
<td>0</td>
<td>0</td>
<td>5</td>
<td>7,217</td>
</tr>
<tr>
<td>Stamford</td>
<td>9,619</td>
<td>100%</td>
<td>9,617</td>
<td>8</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>9,628</td>
</tr>
<tr>
<td>Waterbury</td>
<td>19,644</td>
<td>100%</td>
<td>19,642</td>
<td>10</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>19,654</td>
</tr>
</tbody>
</table>


### Exhibit 6-23
shows a breakdown of National Fire Incident Report System (NFIRS) data for the Fairfield County region.

### Exhibit 6-23
Comparison of NFIRS Summary of Calls by Fairfield Region
Summary by Incident Type
Report Period From 01/01/2019 to 12/31/2019

<table>
<thead>
<tr>
<th>City</th>
<th>Frequency</th>
<th>% of Total Calls</th>
<th>Mutual Aid Non</th>
<th>Mutual Aid Given</th>
<th>Mutual Aid Received</th>
<th>Other Aid Given</th>
<th>Invalid Aid Flag</th>
<th>Exposures</th>
<th>Total Incidents-Fires, Rescues, False Calls</th>
</tr>
</thead>
<tbody>
<tr>
<td>Danbury</td>
<td>2,745</td>
<td>100%</td>
<td>2,745</td>
<td>1</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>2,746</td>
</tr>
<tr>
<td>Norwalk</td>
<td>7,187</td>
<td>100%</td>
<td>7,173</td>
<td>25</td>
<td>14</td>
<td>0</td>
<td>0</td>
<td>5</td>
<td>7,217</td>
</tr>
<tr>
<td>Bridgeport</td>
<td>18,746</td>
<td>100%</td>
<td>18,411</td>
<td>207</td>
<td>52</td>
<td>283</td>
<td>0</td>
<td>5</td>
<td>18,958</td>
</tr>
<tr>
<td>Fairfield</td>
<td>7,543</td>
<td>100%</td>
<td>7,535</td>
<td>10</td>
<td>8</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>7,553</td>
</tr>
<tr>
<td>Greenwich</td>
<td>4,069</td>
<td>100%</td>
<td>4,069</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>4,070</td>
</tr>
<tr>
<td>Newtown</td>
<td>482</td>
<td>100%</td>
<td>367</td>
<td>154</td>
<td>115</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>636</td>
</tr>
<tr>
<td>Ridgefield</td>
<td>802</td>
<td>100%</td>
<td>797</td>
<td>14</td>
<td>5</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>816</td>
</tr>
<tr>
<td>Shelton</td>
<td>31</td>
<td>100%</td>
<td>31</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>31</td>
</tr>
<tr>
<td>Stamford</td>
<td>9,619</td>
<td>100%</td>
<td>9,617</td>
<td>8</td>
<td>2</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>9,628</td>
</tr>
<tr>
<td>Stratford</td>
<td>5,812</td>
<td>100%</td>
<td>5,775</td>
<td>37</td>
<td>37</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>5,850</td>
</tr>
<tr>
<td>Trumbull</td>
<td>196</td>
<td>100%</td>
<td>124</td>
<td>123</td>
<td>64</td>
<td>8</td>
<td>0</td>
<td>0</td>
<td>319</td>
</tr>
<tr>
<td>Westport</td>
<td>3,330</td>
<td>100%</td>
<td>3,326</td>
<td>19</td>
<td>4</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>3,349</td>
</tr>
</tbody>
</table>


### Exhibit 6-24
shows an NFD 2020 workload breakdown of Computer Aided Dispatch (CAD) incidents by apparatus type.
Exhibit 6-24
NFD 2020 CAD Incident Statistics

<table>
<thead>
<tr>
<th>NFD Incidents</th>
<th>2021</th>
<th>2020</th>
<th>+/-</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total CAD Incidents</td>
<td>7,678</td>
<td>6,673</td>
<td>+1,005</td>
</tr>
<tr>
<td>ENGINE 2</td>
<td>2,626</td>
<td>2,169</td>
<td>+457</td>
</tr>
<tr>
<td>ENGINE 1</td>
<td>1,643</td>
<td>1,504</td>
<td>+139</td>
</tr>
<tr>
<td>ENGINE 4</td>
<td>1,595</td>
<td>1,417</td>
<td>+178</td>
</tr>
<tr>
<td>RESCUE</td>
<td>1,214</td>
<td>1,018</td>
<td>+196</td>
</tr>
<tr>
<td>ENGINE 5</td>
<td>1,115</td>
<td>1,002</td>
<td>+113</td>
</tr>
<tr>
<td>TRUCK 2</td>
<td>1,143</td>
<td>930</td>
<td>+213</td>
</tr>
<tr>
<td>ENGINE 3</td>
<td>1,084</td>
<td>902</td>
<td>+182</td>
</tr>
<tr>
<td>MU 238</td>
<td>22</td>
<td>23</td>
<td>-1</td>
</tr>
<tr>
<td>MU 224</td>
<td>12</td>
<td>11</td>
<td>+1</td>
</tr>
<tr>
<td>CAR 2</td>
<td>980</td>
<td>813</td>
<td>+167</td>
</tr>
<tr>
<td>TRUCK 1</td>
<td>714</td>
<td>586</td>
<td>+128</td>
</tr>
<tr>
<td>TOTAL RUNS</td>
<td>12,148</td>
<td>10,375</td>
<td>+1,773</td>
</tr>
</tbody>
</table>
RECOMMENDATION

Recommendation 6-19:

Comprehensively assess and modify the EMD policies, processes and protocols in collaboration with Fire, EMS and Police personnel.

The protocols should include:

- triage questions;
- final determinant codes;
- precise list of emergency medical incidents NFD should respond to; and
- pre-arrival instructions.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

NFD does not employ formal Fire Department industry standards and requirements for apparatus replacement.

Fire Department apparatus provide a life critical function and are required to be 100 percent dependable and reliable 24/7/365 in a multitude of adverse environment and incident location conditions.

NFD relies on the age of the apparatus, repair history, and other subjective information. Exhibit 6-25 shows that out of 17 operational apparatus:

- six apparatus have been in-service 21 to 29 years;
- six apparatus have been in-service 12 to 17 years; and
- five apparatus have been in-service one to seven years.
NFD recommended Rescue 1 (29 years) and Truck 5 (27 years) be retired and replaced.

The cost of Fire Department apparatus can range from $500,000 to over $1.5 million. Because of this significant expense, it is important to accurately and objectively evaluate the need to replace an apparatus. The evaluation and recommendation process should be criteria driven and provide decisionmakers clear, factual, standard-based, and actionable information.

There are numerous established factors that are used to determine if an apparatus should be replaced. A component of the consideration process is the functionality and features provided by a modern apparatus as compared to an apparatus over 20 years of age. A new apparatus may provide capabilities that could significantly enhance NFD’s operational effectiveness.

Organizations, such as the NFPA and IAFC, have criteria that should be employed to justify the replacement of apparatus.

**RECOMMENDATION**

Recommendation 6-20:

*Develop formal criteria to assess the dependability, reliability, safety and operational value of Fire apparatus.*
Once a replacement schedule is established, the NFD should work with Finance to ensure that the amounts needed for the replacements is placed in the five-year capital budgets. The goal of this recommendation is to provide City leadership with information needed to justify significant investments.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING**

The Fire Marshal’s Section is not able to complete required inspections.

The Fire Marshal’s Section has a host of responsibilities— including annual code inspections, fire scene investigations, new construction inspections, and public education programs. Personnel reported that, due to both front office (civilian) and Fire Inspector staff vacancies, the Office does not have the capacity to complete assigned tasks. For example, it was estimated only 50 percent of the required annual code inspections were completed in 2021.

**RECOMMENDATION**

**Recommendation 6-21:**

Conduct a comprehensive staffing and workload assessment of the Fire Marshal's Section, and immediately fill all vacancies.

If a full contingency of Fire Marshal staff is still unable to handle the assigned workload, the Department, and should establish a priority of services to ensure skilled personnel are focused on the most critical tasks where possible redistribute the administrative workload or consider the need for additional administrative support.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.
CHAPTER 7:

ECONOMIC AND COMMUNITY DEVELOPMENT
7.0 ECONOMIC AND COMMUNITY DEVELOPMENT

The Department of Economic and Community Development was established during the City’s reorganization in FY 2019. City Ordinance Section § 35B states that the Chief:

...shall be responsible for neighborhood, community and economic development planning and programs; planning and zoning; code enforcement; blight enforcement; business development and tourism, transportation, mobility and parking as well as a liaison to state and federal agencies dealing with these areas...

Economic and Community Development (ECD) is composed of four Departments: (1) Building and Code Enforcement; (2) Business Development and Tourism; (3) Planning and Zoning; and (4) Transportation, Mobility and Parking.

This chapter is intended to focus on operational effectiveness and efficiencies within Economic and Community Development.

Chapter 7 is divided into the following five sections:

7.1 Organization and Management
7.2 Building and Code Enforcement
7.3 Business Development and Tourism
7.4 Planning and Zoning
7.5 Transportation, Mobility and Parking

7.1 ORGANIZATION AND MANAGEMENT

ECD is led by the Chief of Economic and Community Development with the four Department Directors reporting to the Department Chief.

There are a total of 35 full-time employees within ECD. The Department Directors and one Administrative Assistant report directly to the Department Chief.

The responsibilities of each ECD Department include:

- **Building and Code Enforcement Department** ensures health and safety related to the physical development of the City. They oversee the adoption and enforcement of subdivision and building codes. The Department conducts required inspections of buildings and sites for code compliance, and issues all building and related trade permits. In addition, they oversee neighborhood cleanups, adopt-a-spot coordination, graffiti remediation, and blight related issues.

- **Business Development and Tourism Department** is a new department that the City created in the reorganization. They provide guidance to new and existing businesses,
engage larger firms for relocation, and promote Norwalk businesses. The Department highlights Norwalk as a tourist destination and coordinates with other City departments and local agencies on event planning for the City.

- **Planning and Zoning Department** plans and coordinates the physical development of the City, including overseeing operations of the conservation staff, and the adoption and enforcement of zoning regulations. This Department adopts and implements the City’s plan of development once every 10 years and is responsible for planning efforts on behalf of the City.

- **Transportation, Mobility and Parking (TMP) Department** is a new Department that the City created in the reorganization. TMP designs safe and equitable multi-modal streets, provides safe routes for pedestrians, and oversees crosswalks, signal systems, parking, curb management planning and design, and connectivity. This Department also collaborates with the Norwalk Transit District and Parking Authority.

ECD’s management-level organizational structure is shown in Exhibit 7-1. A more detailed department-level organizational structure is provided in the individual department sections of this chapter.

**Exhibit 7-1**

**Department of Economic and Community Development Organizational Chart**

In addition to daily operations, ECD provides staff support to the following 14 Boards and Commissions:

- Arts Commission: staffed by Business Development and Tourism
- Bike/Walk Commission: staffed by Transportation, Mobility and Parking
- Blight Appeals/Hearings: staffed by Building and Code Enforcement
- Code Enforcement/Building Appeals: staffed by Building and Code Enforcement
- Conservation Commission: staffed by Planning and Zoning
- Harbor Management Commission: staffed by Planning and Zoning
- Historical Commission: staffed by Planning and Zoning
- Parking Authority: staffed by Transportation, Mobility and Parking
Parking Authority Appeals: staffed by Transportation, Mobility and Parking
Planning Committee: staffed by Business Development and Tourism and Economic and Community Development
Planning Commission: staffed by Planning and Zoning
Traffic Authority: staffed by Transportation, Mobility and Parking
Zoning Board of Appeals: staffed by Planning and Zoning
Zoning Commission: staffed by Planning and Zoning

Staff are responsible for developing agendas, memos, drafting resolutions, and for preparing background materials for the meetings. These boards and commissions range in roles and responsibilities—some serve in an advisory capacity, while others have decision-making authority.

FINDING

Further coordination between the Transportation, Mobility and Parking (TMP), Engineering and Public Works is required to delineate tasks and responsibilities related to project management and roles. In addition, joint development standards and guidelines should be considered to clearly identify the City’s unified approach. For example, the teams have different opinions about tree-lined streets. There are currently no minimal trees between the sidewalk and the street. New streets can be too narrow with insufficient room for fire trucks and ambulances to get through and respond to calls. Citizens and City Officials have an expectation of tree-lined streets in this grassy strip, as a traffic calming measure, a community development element and a resiliency/sustainability effort. Public Works sees this strip of grass as the “snow lane” and has concerns about road width for emergency vehicles.

Public Works and TMP need better collaboration between the teams. Public Works and TMP’s project “to-do” lists are not always consistent and have resulted in work being done off-schedule. TMP has planning and design in its Department, but sometimes Public Works manages the design. However, TMP is not aware of the available resources for Public Works. Also, Public Works houses the Construction staff. TMP focuses on new sidewalks, but the engineers in Public Works implement the projects. There is not a clear separation in roles and responsibilities between Public Works engineers and TMP.

In another example, signs are managed in one department, and painting of signs is managed in another department. When Public Works installs signs incorrectly, with poor quality work or are installed at the wrong angle, TMP is compelled to address the problems. The priorities are inconsistent. As a last example, Public Works and TMP use different roadway manuals to provide guidance on street usage and design. Public Works uses an outdated 1990’s Roadway Standards Manual while TMP uses Complete Streets, Multi-Modal Design.

RECOMMENDATION

Recommendation 7-1:

Develop, and agree to implement, consistent policies and standards through a working group of representatives from Transportation, Mobility and Parking, Engineering and
Public Works, after vetting all projects, emerging issues, and grant applications to ensure these departments begin working with common goals and objectives for the City.

The Departments already meet weekly, but they should evaluate the meeting participants to determine if additional staff should be included for a broader conversation on certain topics. The Departments should coordinate and communicate regarding ongoing concerns between the functions to allow the Departments to identify more timely improvements and solutions.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The software application, Municity, is not being maximized. Municity is intended to be used to track permit application workflows, record comments, and track progress. The system is inconsistently used. Staff reported it to be cumbersome to interact with. Staff also reported that they have not received training on how to use the system and the system does not have specific workflows that meet the needs of the Department.

Staff said they are not using all its features because they may include other notes in paper documents that they do not add into Municity. For example, if the applicant fails an inspection, the Department only includes pass or fail in Municity. The reasons for failing are typically only added to the paper binder and not into Municity. Having more information available in the hard copy only further reduces the usefulness of this system. If the applicant or others have questions about the failure, the staff retrieves the information in Municity and then must pull the paper binder for the specific details. Municity has the capability to add notes, but the staff said that they do not use this feature.

Municity was recently sold and the staffing model of the vendor has changed. The City is having difficulty resolving issues and challenges with the software. The response time with the vendor is causing challenges using the software in a meaningful way. As a result, the City has decided to pause any advancement of the existing tool.

The partnership with Municity was established through a contract between WestCOG and 24 different municipalities in Connecticut. The financial commitment to Municity has been insignificant, although the time dedicated by the teams for implementation has been hundreds of hours (among all the departments—Health, Building and Code Enforcement, Planning and Zoning, etc.).

The City has identified ARPA funds to launch a holistic online permitting and licensing effort. Partnering with the IT Department, an RFP for a Municity replacement, are still to be developed. The chief said that they are in the beginning process of drafting an RFP for a new software system to provide workflows, manage projects, track permits, and provide communications/feedback to the public. The initial RFP is being developed with the input of
some staff, but must be shared with other staff, across the City, to ensure a meaningful and successful implementation.

An online permitting and payment feature is not available in Municity. Prior to the Department deciding to limit the use of Municity, some staff had coordinated with the vendor to identify 20 different types of application forms that the Department could convert to an electronic format, including a permit fee collection process. The vendor had proposed to connect Municity with the web application City Squared, to allow customers to create an account and submit the permit fee online. The Department reported that there are no further discussions with the Municity vendor. As a result, the Department can only collect permit fees in person in the Department.

Operating independently without coordinating with other City departments in software decisions and implementation increases inefficiency and inconsistency.

There are a number of systems in use by other cities nationally that may have the functionality that Norwalk needs. A key factor in the selection of a new system, is not confined to ECD and its needs. The issue is finding a system that can be integrated with the current ERP system and other state and federal reporting entities as may be required by other departments, as well as provide the public with easily accessible access to the type of services and information they need.

RECOMMENDATION

Recommendation 7-2:

Place a moratorium on developing and implementing any new systems until a CIO has been hired and a full citywide needs assessment has been completed.

Chapter 9 – Information Technology recognizes the need for a Chief Information Officer and the need for a citywide IT needs assessment to reduce the proliferations of piecemeal and unsupported system. Evergreen is recommending that all departments should coordinate any future plans with the new CIO position regarding software systems, online payment systems, permitting systems and a host of other department specific applications.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The Department lacks an efficient process to receive, record, retain and retrieve key documents. With the documents all in a paper format, the process to search and respond to public requests for historical records is inefficient. Each of the Departments has a role with these paper documents. For example, the Planning and Zoning Department and Building and Code Enforcement Department staff conduct an estimated 2,700 land use and permit record searches annually. Building plans are a unique type of document that require a specific type of care. The
Transportation, Mobility and Parking Department have plan review documents that exist in a paper format. The Business Development and Tourism Department use these records to assist businesses who need information.

ECD has several thousand boxes of historical paper zoning and permitting records that date back to 1923. Staff search these boxes daily in response to public requests for research on title records and permitting history. Storage boxes are cataloged by month and year, so multiple storage boxes must be retrieved to conduct a single search. These boxes are stored in the basement of City Hall and the staff utilize a carbon paper slip to request boxes daily to review paper records, compile data, and respond to the request for information.

In addition to the paper records, the Building and Code Enforcement Department also maintains one 10+ year old computer with an external hard drive that contains historical permit application files from the previously utilized software, Cornerstone. When the City converted its records to Municity, several thousand files were not properly transferred. These records are only accessible on this one computer. Should that data become inaccessible, the data would be lost.

The current system of storing paper files in cardboard boxes in the basement puts the City at risk of losing its historical records; paper becomes increasingly fragile with age, original images and handwriting fade, and repeated handling of original documents increases the potential for misplacement.

The management and research of non-digital records is also expensive. There are three dedicated positions that conduct historical record searches and another position that retrieves up to 60 boxes a day between the two Departments. These staff spend their time locating records, requesting boxes, sorting files, copying paper records, refiling, and returning the documents to the correct location.

The Department recognized this need. Plan of Conservation and Development In FY 2022, the Department has $150,000 approved in the capital budget specifically for the scanning of field cards. The justification for the funding states:

The City has historic tax assessment field cards (from 1929, 1959, 1972 and 1983 that are used daily by Zoning as well as Code Enforcement staff.) These cards have vital pieces of information that indicate prior ownership, historic use on the property as well as information related to the individual buildings. We use these documents to establish history and legality on properties. Some cards, particularly the 1929 cards are getting very worn. In addition, we need to manually search boxes...

Understanding that other documents including plans also needed to be digitized, using ARPA funds, the City has committed an additional $400,000 to the initiative. Staff have identified this effort in their workplan for the first quarter of 2023. Efforts will include coordination with other teams, working with procurement on a RFP, interviewing vendors and executing a contract.

The City of New Haven undertook a digitizing project in 2019 to create electronic records of over 1.4 million pages of building permits that dated back to the 19th Century. The City partnered with a vendor to create a digital record of all of its non-digital files over the course of
three months. The data were then uploaded to a digital content management system where the images were made text-searchable. This reduced staff time and resources that were dedicated to searching paper files and also provided accessibility in an online, public facing system. In addition to providing an opportunity for the public to search permitting records, the new system also allows for permit applications to be submitted electronically, thus continuing to reduce paper. The digitizing project was part of the City’s initiatives to reduce use of paper by up to 70 percent and increase accessibility of data. The contract to digitize all building permit records was completed at a cost of $192,000. A similar system is also being utilized by 36 other municipalities in Connecticut (https://www.viewmypermitct.org/).

The Property Records Industry Association has developed best management practices for Land Records Management Systems that includes recommended procedures for digitizing records, development and maintenance of web interfaces, and management of data. Digitizing records ensures the preservation of historical data and allows for existing and new records to be indexed. Best management practices suggest that digitizing non-digital records allows for increased access to the data, improves the efficiency of service for both internal and external customers, and reduces the handling of fragile or repeatedly used original material. Digitizing records also protects the City from accidental loss due to environmental (humidity and temperature) changes, ruptured pipes, fire, flooding, or other natural disaster.

RECOMMENDATION

Recommendation 7-3:

Continue with plans to inventory and plan for the conversion of the paper documents to a digital format, digitize and index all historical records.

ECD should develop a plan to convert its paper records into an electronic format. The Department will need to first prepare the documents for conversion to an electronic format. Each Department should estimate the number of non-digital records currently housed in storage and review IT capabilities to store data in a digital content management system. The plan should include the records that are stored in the previously used software, Cornerstone. ECD should back up the data files and transfer them to a new system to prevent loss of these records and to ensure compliance with Connecticut Records Retention Guidelines.

FISCAL IMPACT

There is no fiscal impact assumed in this recommendation due to the capital ARPA funds that were requested and approved. In addition, Chapter 2 – Administration and Management contains a citywide recommendation for digitizing all City archives over a period of five years and estimates an additional cost of $500,000.

FINDING

Both the Planning and Zoning and Building and Code Enforcement Department have re-evaluated their fee rate structure and established fees designed to cover the cost of the service provided.
The Planning and Zoning Department had not revised the rate schedule since 2017. However, in January 2022, Planning and Zoning completed their review and set new rate schedules. The Building and Code Enforcement Department had already evaluated and increased their rates in 2021.

**Exhibit 7-2** shows the 2017 fee schedule for the City and for other nearby cities selected by the Planning and Zoning Department for selected types of Planning and Zoning Department fees. Compared to the peer city average, the City of Norwalk’s fees were less than the average.

**Exhibit 7-2**

**Planning and Zoning City Fee Schedule**

<table>
<thead>
<tr>
<th>Type of Fee</th>
<th>Norwalk</th>
<th>Greenwich</th>
<th>Stamford</th>
<th>Westport</th>
<th>Darien</th>
<th>Peer City Average</th>
</tr>
</thead>
<tbody>
<tr>
<td>Zoning Regulations</td>
<td>$25</td>
<td>$70</td>
<td>N/A</td>
<td>$25</td>
<td>N/A</td>
<td>$47.50</td>
</tr>
<tr>
<td>Zoning Map</td>
<td>$10</td>
<td>$30 outline; $40 color</td>
<td>N/A</td>
<td>$12.50</td>
<td>N/A</td>
<td>$21.25</td>
</tr>
<tr>
<td>Subdivision</td>
<td>$200 per lot $400 minimum</td>
<td>$500 for 2 lots, plus $700 for each additional lot</td>
<td>N/A</td>
<td>N/A</td>
<td>$600</td>
<td>$550</td>
</tr>
<tr>
<td>Zone Change/Zoning Amendment</td>
<td>$500</td>
<td>$1,090</td>
<td>N/A</td>
<td>$500</td>
<td>$660</td>
<td>$750</td>
</tr>
<tr>
<td>Special Permit/Site Plan Review Application</td>
<td>$350</td>
<td>$1,090</td>
<td>N/A</td>
<td>$600</td>
<td>$480</td>
<td>$723</td>
</tr>
<tr>
<td>Residential One &amp; Two Family</td>
<td>$200</td>
<td>$1,200-$4,500 depending on the number of units</td>
<td>$200</td>
<td>$300</td>
<td>$360</td>
<td>$515</td>
</tr>
<tr>
<td>Residential Multifamily</td>
<td>$500</td>
<td>$1,200-$4,500 depending on the number of units</td>
<td>$200 for 3 or more units plus $200 per additional unit</td>
<td>$300</td>
<td>$360</td>
<td>$515</td>
</tr>
<tr>
<td>Commercial/Industrial</td>
<td>$500</td>
<td>$1,200-$4,500 depending on the number of square feet</td>
<td>$300 for 3,000 square feet plus $175 per each additional 1,000 square feet</td>
<td>$600</td>
<td>$360</td>
<td>$615</td>
</tr>
</tbody>
</table>

Source: City of Norwalk Revised Schedule of Fees: Fees for Maps & Applications Planning, Zoning & ZBA, 2017; Town of Greenwich Fee Schedule, 2020; Stamford Zoning Enforcement Fee Schedule, no date; Westport Land Use Fees, 2015; Darien Land Use Board Application Fees, 2019.

In January 2022, the Planning and Zoning Department implemented an amended fee schedule shown in **Exhibit 7-3**.
### Exhibit 7-3
Norwalk Planning and Zoning Revised Fee Schedule
January 2022

#### REVISED Schedule of Fees
FEES FOR MAPS & APPLICATIONS PLANNING, ZONING & ZBA
Effective January 27, 2022

<table>
<thead>
<tr>
<th>REGULATIONS &amp; MAPS*</th>
<th>CITY**</th>
<th>Any Questions</th>
</tr>
</thead>
<tbody>
<tr>
<td>PLAN OF CONSERVATION &amp; DEVELOPMENT</td>
<td>$25</td>
<td>Contact Director Steve Kleppin at 203-654-7956</td>
</tr>
<tr>
<td>ZONING REGULATIONS</td>
<td>$25</td>
<td></td>
</tr>
<tr>
<td>ZONING MAP</td>
<td>$10</td>
<td></td>
</tr>
<tr>
<td>SUBDIVISION REGULATIONS</td>
<td>$5</td>
<td></td>
</tr>
<tr>
<td>HARBOR MANAGEMENT PLAN &amp; ADDENDUM</td>
<td>$10</td>
<td></td>
</tr>
<tr>
<td>COPIES (PER PAGE)</td>
<td>$0.50</td>
<td></td>
</tr>
<tr>
<td>*All documents available for download online!</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#### APPLICATION AND PERMIT FEES

<table>
<thead>
<tr>
<th>Application</th>
<th>Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>AMENDMENT TO TWP. POCD</td>
<td>$1,660</td>
</tr>
<tr>
<td>ZONE CHANGE ZONING AMENDMENT APPLICATION</td>
<td>$1,060</td>
</tr>
<tr>
<td>SUBDIVISION APPLICATION: TWO-LOT</td>
<td>$810</td>
</tr>
<tr>
<td>PER ADDITIONAL LOT</td>
<td>$200</td>
</tr>
<tr>
<td>SPECIAL PERMIT APPLICATION</td>
<td>$810</td>
</tr>
<tr>
<td>SITE PLAN APPLICATION</td>
<td>$710</td>
</tr>
<tr>
<td>CAM APPLICATION: 1 OR 2 FAMILY</td>
<td>$310</td>
</tr>
<tr>
<td>ALL OTHERS</td>
<td>$810</td>
</tr>
<tr>
<td>MOTOR VEHICLE LICENSE</td>
<td>$510</td>
</tr>
<tr>
<td>SCENIC ROAD APPLICATION</td>
<td>$300</td>
</tr>
<tr>
<td>UNAUTHORIZED MODIFICATIONS TO PLAN WITHOUT PRIOR COMMISSION APPROVAL</td>
<td>$1,000</td>
</tr>
</tbody>
</table>

- All Special Permit & site plan applications; CAM over 6 units, commercial & industrial
- Village District applications (where permitted not otherwise authorized)

<table>
<thead>
<tr>
<th>Extension of Time: Site Plan/CAM Site Plan &amp; Special Permit</th>
<th>CITY**</th>
</tr>
</thead>
<tbody>
<tr>
<td>(Must provide written confirmation from Tax Collector of property tax status)</td>
<td>$1,500</td>
</tr>
</tbody>
</table>

### ZONING PERMIT:

<table>
<thead>
<tr>
<th>Type of Permit</th>
<th>Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>PROPANE TANKS, ACS UNITS &amp; ACCESSORY STRUCTURES &lt; 100 SF</td>
<td>$110</td>
</tr>
<tr>
<td>ALL OTHER ACCESSORY STRUCTURES</td>
<td>$200</td>
</tr>
<tr>
<td>RESIDENTIAL CHANGE IN USE/HOME OCCUPATION/INTERIOR ALTERATION</td>
<td>$160</td>
</tr>
<tr>
<td>NEW SINGLE-FAMILY DWELLING</td>
<td>$400</td>
</tr>
<tr>
<td>NEW TWO-FAMILY DWELLING</td>
<td>$560</td>
</tr>
<tr>
<td>1 &amp; 2 FAMILY ADDITION (&lt; 1,000 SF)</td>
<td>$210</td>
</tr>
<tr>
<td>1 &amp; 2 FAMILY ADDITION (&gt; 1,000 SF)</td>
<td>$310</td>
</tr>
<tr>
<td>MULTI FAMILY (MINIMUM)</td>
<td>$660</td>
</tr>
<tr>
<td>PER ADDITIONAL UNIT</td>
<td>$100</td>
</tr>
<tr>
<td>NON-RESIDENTIAL NEW CONSTRUCTION (&lt; 5,000 SF)</td>
<td>$560</td>
</tr>
<tr>
<td>NON-RESIDENTIAL NEW CONSTRUCTION (5,000 SF - 24,999 SF)</td>
<td>$810</td>
</tr>
<tr>
<td>NON-RESIDENTIAL NEW CONSTRUCTION (&gt; 25,000 SF)</td>
<td>$1,060</td>
</tr>
<tr>
<td>NON-RESIDENTIAL INTERIOR ALTERATION/TENANT FIT-UP (&lt; 1,500 SF)</td>
<td>$310</td>
</tr>
<tr>
<td>NON-RESIDENTIAL INTERIOR ALTERATION/TENANT FIT-UP (1,500 - 2,999 SF)</td>
<td>$385</td>
</tr>
<tr>
<td>PER ADDITIONAL 1,000 SF OVER 2,999 SF</td>
<td>$75</td>
</tr>
<tr>
<td>GROUND/BILLBOARD SIGN</td>
<td>$460</td>
</tr>
<tr>
<td>ALL OTHER SIGNS (PER SIGN)</td>
<td>$210</td>
</tr>
<tr>
<td>EXCAVATION, FILLING AND GRADING</td>
<td>$260</td>
</tr>
</tbody>
</table>

### APPEALS AND VARIANCE APPLICATIONS

<table>
<thead>
<tr>
<th>Type of Application</th>
<th>Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>RESIDENTIAL ONE &amp; TWO FAMILY</td>
<td>$260</td>
</tr>
<tr>
<td>RESIDENTIAL MULTIFAMILY</td>
<td>$560</td>
</tr>
<tr>
<td>COMMERCIAL INDUSTRIAL</td>
<td>$560</td>
</tr>
<tr>
<td>SPECIAL EXCEPTION</td>
<td>$560</td>
</tr>
<tr>
<td>APPEALS</td>
<td>$260</td>
</tr>
<tr>
<td>EXTENSION OF TIME</td>
<td>$510</td>
</tr>
</tbody>
</table>

### ZONING VERIFICATION LETTERS

<table>
<thead>
<tr>
<th>Type of Letter</th>
<th>Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>ONE &amp; TWO FAMILY</td>
<td>$200</td>
</tr>
<tr>
<td>ALL OTHERS</td>
<td>$500</td>
</tr>
</tbody>
</table>

**Where applicable, fee includes a $60 fee per CGS 22a-25j (PA 09-03)**

***Applicants for subdivisions, special permits, site plans, CASH or any amendments must pay the cost of the legal notice(s) directly to the Norwalk Hour.***

Source: City of Norwalk Revised Schedule of Fees for Maps & Applications Planning, Zoning & ZBA 2022.
Exhibit 7-4 includes the fee schedule for the City and for other nearby cities for selected types of Building and Code Enforcement Department fees. As can be seen, compared to the peer city average, the City of Norwalk’s fees are competitive.

**Exhibit 7-4**  
**Building and Code Enforcement City Fee Schedule**  
**2012 through 2021**

<table>
<thead>
<tr>
<th>Type of Fee</th>
<th>Norwalk</th>
<th>Greenwich</th>
<th>Stamford</th>
<th>Westport</th>
<th>Darien</th>
<th>Peer City Average</th>
</tr>
</thead>
</table>
| Building – Residential and Commercial | Residential: $18.26 per every $1,000 spent on labor and materials  
Commercial: $20.26 per every $1,000 spent on labor and materials | Residential and Commercial: $12 per $1,000 of valuation of work  
Commercial: $15.26 per $1,000 of valuation of work | Residential: $13.26 per $1,000 in construction cost  
Commercial: $16.76 per $1,000 for the first $1 million in construction costs; $25.26 per $1,000 for over $1 million in construction costs | Residential: $10.26 for each $1,000 in value  
Commercial: $11.26 for each $1,000 in value | Residential and Commercial: $10.26 for every $1,000 valuation of work | Residential and Commercial: $11.76 for every $1,000 in value  
Commercial: $13.39 for every $1,000 in value |
| Electrical                         | Residential: $18.26 per every $1,000 spent on labor and materials  
Commercial: $20.26 per every $1,000 spent on labor and materials | Residential and Commercial: $12 per $1,000 of valuation of work  
Commercial: $15.26 per $1,000 of valuation of work | Residential: $13.26 per $1,000 in construction cost  
Commercial: $16.76 per $1,000 for the first $1 million in construction costs; $25.26 per $1,000 for over $1 million in construction costs | Residential: $10.26 for each $1,000 in value  
Commercial: $11.26 for each $1,000 in value | Residential and Commercial: $10.26 for every $1,000 valuation of work | Residential and Commercial: $11.45 for every $1,000 in value  
Commercial: $12.57 for every $1,000 in value |
| Plumbing                           | Residential: $18.26 per every $1,000 spent on labor and materials  
Commercial: $20.26 per every $1,000 spent on labor and materials | Residential and Commercial: $12 per $1,000 of valuation of work  
Commercial: $15.26 per $1,000 of valuation of work | Residential: $13.26 per $1,000 in construction cost  
Commercial: $16.76 per $1,000 for the first $1 million in construction costs; $25.26 per $1,000 for over $1 million in construction costs | Residential: $10.26 for each $1,000 in value  
Commercial: $11.26 for each $1,000 in value | Residential and Commercial: $10.26 for every $1,000 valuation of work | Residential and Commercial: $11.45 for every $1,000 in value  
Commercial: $12.57 for every $1,000 in value |
| Heating                            | Residential: $18.26 per every $1,000 spent on labor and materials  
Commercial: $20.26 per every $1,000 spent on labor and materials | Residential and Commercial: $12 per $1,000 of valuation of work  
Commercial: $15.26 per $1,000 of valuation of work | Residential: $13.26 per $1,000 in construction cost  
Commercial: $16.76 per $1,000 for the first $1 million in construction costs; $25.26 per $1,000 for over $1 million in construction costs | Residential: $10.26 for each $1,000 in value  
Commercial: $11.26 for each $1,000 in value | Residential and Commercial: $10.26 for every $1,000 valuation of work | Residential and Commercial: $11.45 for every $1,000 in value  
Commercial: $12.57 for every $1,000 in value |
| Sign                               | $20 per $1,000 value | $15 per $1,000 of valuation | N/A | $10.26 for each $1,000 in construction value | N/A | $12.63 for every $1,000 in value |

Source: Norwalk Building Permit Fees, 2021; Greenwich Building Permit Fees, 2018; Stamford Building Permit Fees, 2019; Westport Building Permit Fees, 2012; Darien Building Permit Fees, not dated.
COMMENDATION

ECD Departments have reviewed the fee schedules and rates to ensure the City is recovering the cost of providing the services.

FINDING

ECD lacks written documentation that comprehensively defines historical processes, current workflows and guidelines, and training documents for staff. Some Departments maintain reference documents. For example, in Building and Code Enforcement each Inspection Team conducts many unique and specific tasks to support its work. The Team often relies on the state law as the basis for their work. However, that defines the requirements, but not how the ECD staff are expected to implement the requirements.

Department heads also do not conduct ongoing analysis related to the position’s roles and responsibilities. For example, in the absence of a documented procedure, it is difficult to analyze the workflow to determine how the work might be performed more efficiently. Rather, staff will tend to continue to do what they have always done without questioning whether there is a better way to achieve the same goals.

The current Building Official has over 30 years of experience, has a very hands-on approach to management, and continues to actively be involved in conducting inspections; therefore, the Building Official is able to assess the efficiency of the inspection processes. A void resulted in Building and Code Enforcement when staff accepted the early retirement incentive without a plan and documented procedures. The Department said they experienced a delay when the process to collect and remit permit application fees had not been recorded.

Without documenting processes and procedures, institutional knowledge is lost when experienced leave the Department. Effective organizations record and update the practices, procedures, and process steps to ensure continuity of services and programs.

RECOMMENDATION

Recommendation 7-4:

Prepare a comprehensive Procedures Manual for each of the four Departments within Economic and Community Development.

The Department Chief should require that each Director identify and document key tasks conducted in each of their Departments. The teams should include sample documents and forms in the procedures. The Manual should include internal management practices, procedures, associated legal authorities, legislative references, internal workflows, guidance documents, and training materials.

Each Department should define the role and responsibility of each position and develop desk procedures so that the daily functions and workflows are properly described. The Department
leaders should post the procedures on an internal site for use by all levels of staff and annually review the procedures to update as needed.

**FISCAL IMPACT**

No fiscal impact is assumed in this recommendation. Chapter 2 – Administration and Management, this recommendation is made citywide and a one-time cost of $150,000 is estimated to provide a facilitator to assist Department leaders to document its processes and procedures.

**FINDING**

The Departments have an inconsistent fee schedule to search historical public records. The Building and Code Enforcement Department charges a minimum of $5 per search (credit card minimum) and a $0.50/page charge for extensive copies. They also create two copies of every search result; one is provided to the original requestor, and one is maintained as a file record for five years. The Planning and Zoning Department typically does not charge for this research service, and they do not maintain additional copies. In January 2022, Planning and Zoning revised its fee schedule, and now charges 50 cents per page.

**Exhibit 7-5** provides a summary of annual public record research requests for the Building and Code Enforcement and the Planning and Zoning Departments.

<table>
<thead>
<tr>
<th>Department</th>
<th>Number Requested</th>
<th>Total Fees Collected</th>
<th>Avg Fee/Request</th>
</tr>
</thead>
<tbody>
<tr>
<td>Building and Code</td>
<td>1,929</td>
<td>$18,422.10</td>
<td>$9.55</td>
</tr>
<tr>
<td>Enforcement</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Planning and Zoning</td>
<td>780*</td>
<td>$0.00</td>
<td>$0.00</td>
</tr>
</tbody>
</table>

Source: Evergreen compiled from Records Technician log, 2021.
*During Evergreen interviews with Planning and Zoning; staff provided an estimate of 30 – 40 requests weekly.

Having different process and costs for a similar records search creates unnecessary confusion for the public who request these documents.

**Exhibit 7-6** provides a comparison of fees for record copy and research services at comparable municipalities. The fees charged by other municipalities range depending on the extent of the research, number of copies, and electronic availability. Unlike Norwalk, some cities charge $25 per hour for requests requiring more than two hours for staff to prepare.
Exhibit 7-6

Summary of Fees for Record Searches at Comparable Municipalities
FY 22

<table>
<thead>
<tr>
<th>Municipality</th>
<th>Research and/or Copy Fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk, CT</td>
<td>Requests requiring more than two hours may be charged up to $25 per hour; copies are charged at $0.05/page or for the cost of a portable storage device. Payment is required prior to filling a request.</td>
</tr>
<tr>
<td>Newton, MA</td>
<td>Requests requiring more than two hours may be charged up to $25 per hour; copies are charged at $0.05/page or for the cost of a portable storage device. Payment is required prior to filling a request.</td>
</tr>
<tr>
<td>Lynchburg, VA</td>
<td>Requests requiring more than two hours may be charged up to $25 per hour; copies are charged at $0.05/page or for the cost of a portable storage device. Payment is required prior to filling a request.</td>
</tr>
<tr>
<td>Cranston, RI</td>
<td>Requests requiring more than two hours may be charged $25 per hour to collect, segregate, and redact the documents if necessary. The City is permitted to charge $.05 per copy, or for the cost of a portable storage device. The City requires payment before fulfilling a request.</td>
</tr>
<tr>
<td>Framingham, MA</td>
<td>Requests requiring more than 2 hours of employee time may be assessed a fee of a rate not to exceed $25 an hour; $0.05 black and white paper copies or computer printouts of public records for both single and double-sided sheets.</td>
</tr>
<tr>
<td>Stamford, CT</td>
<td>Pre-COVID there was a requirement for subscription or payment of a one-time fee to search electronic City records. Customers could also pay a one-time fee. Currently those fees have been removed to address concerns related to COVID. In-person copies - there is a minimum fee to make paper copies.</td>
</tr>
</tbody>
</table>

Source: Evergreen compiled data from municipal websites, 2021.

RECOMMENDATION

Recommendation 7-5:

Implement a consistent practice and fee schedule for record searches.

ECD should implement a consistent practice for record searches and the fees charged for copies. ECD should also eliminate the retained paper copy and maintain as an electronic file record instead, and evaluate current fee schedule rates on an annual basis and adjust as appropriate.

When ECD implements online permitting and licensing, the Department should re-evaluate this component of their operation.

FISCAL IMPACT

The fiscal impact assumes that Planning and Zoning will assess a fee for its 780 annual requests. The gain is based on the $9.55 average fee per request received by Building and Code Enforcement. 780 requests x $9.55 per request = $7,449.

The fiscal impact also assumes that an additional $25 per hour fee is added for requests that require more than two hours to prepare. The City’s rate does not address the amount of time to complete the request. However, comparable cities charge $25 per hour for requests requiring more than two hours to prepare. The fiscal impact assumes the same number of requests are received in future years, and that 25 percent of the total requests take more than two hours to
prepare. The annual fiscal impact revenue gain of $16,925 is based on 2,709 total requests (1,929 Building and Code Enforcement + 780 Planning and Zoning) received in FY 2020-21 x 25 percent = 677 requests. 677 x $25 = $16,925.

The total fiscal impact is $24,374 ($7,449 + $16,925).

A decrease in overhead costs for printing supplies and a reduction in physical storage space could also be realized by eliminating the second copy and maintaining an electronic copy instead.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Implement Consistent Practice and Fee Schedule for Record Searches</td>
<td>$24,374</td>
<td>$24,374</td>
<td>$24,374</td>
<td>$24,374</td>
<td>$24,374</td>
</tr>
</tbody>
</table>

**FINDING**

The Economic and Community Development’s website and the related Department webpages are not organized as effectively as possible to assist the public with the permitting process. The Department has recognized that there are opportunities to improve the website and have actively been working to update and revise the webpages. A newly developed ECD website is anticipated to launch in April 2022. For example, the main landing page provides minimal detail on the purpose of the Department and does not contain information on the Departments and Offices that are housed in ECD.

**Exhibit 7-7** shows the ECD webpage.

For example, as shown in **Exhibit 7-7** in the lower right frame of the webpage, ECD’s purpose states that staff “…serve as a business support resource for small businesses and others interested in locating or doing business in Norwalk.” However, this content does not mention the areas of responsibility. The middle frame of the same page also contains limited information, with the content focused on the City Plan and business development tools. Three of the five available hyperlinks in the middle frame either do not redirect to the appropriate page or are a broken link. Clicking on the Visit Norwalk link refreshes the current page rather than forwarding to the https://www.visitnorwalk.org/ page; the Business and Economic Development Tools link forwards to a BDT landing page but not directly to tools.

In order to submit a permit, a code violation or complaint, or access parking information, members of the public must know to click on a hyperlink in the left frame and, either by previous knowledge or trial and error, select the appropriate Department. This is an inefficient communication process and can lead to frustration for members of the public.
The Department webpages are also not organized in a consistent manner and do not consistently contain the same level of information or present information in a clear way. For example:

- The **Building and Code Enforcement** landing page is text heavy and does not include a true checklist to inform the public of the type of permit that is needed for different types of projects. The information that is available requires the user to click through an additional link before accessing.

- The **Business Development and Tourism** has limited information on the landing page and is limited in usability.
The Planning and Zoning Department’s landing page contains information on current projects, and provides a description of its roles and responsibilities. There is not a direct link on this page to apply for a zoning permit or request research of property records.

The Transportation, Mobility, and Parking Department landing page is also a text heavy page with limited information on the different programs under its purview.

Best management practices from the US General Services Administration state the public-facing government websites should meet the following eight specific requirements:

1. Accessible - be accessible to individuals with disabilities in accordance with Section 508
2. Consistent - have a consistent appearance
3. Authoritative - not overlap with or duplicate existing websites
4. Searchable - contain a search function
5. Secure - be provided through a secure connection
6. User-centered - be designed around user needs with data-driven analysis
7. Customizable - provide an option for a more customized digital experience
8. Mobile-friendly - be functional and usable on mobile devices

Other Connecticut cities, such as Stamford, designed their webpages to be consistent with the best management practices. Exhibit 7-8 provides an example of the City of Stamford’s Building Department webpage.
Exhibit 7-8
City of Stamford Webpage

Source: City of Stamford, CT Website; https://www.stamfordct.gov/government/operations/building-department 2022
The webpage provides sufficient information, documents and forms that are easily accessible, and the link to apply for permits is prominently placed in the middle frame. Users are also able to apply for all permits online and track progress through the review process.

RECOMMENDATION

Recommendation 7-6:

**Coordinate with the new recommended Webmaster to ensure consistency in all webpages.**

Chapter 2 – Administration and Management includes recommendations regarding creating a Communications Office and hiring a Webmaster. Although ECD is already working on improvements, once a Webmaster is hired, Economic and Community Development should coordinate with these positions to identify and revise the department-level webpages to ensure the City is delivering consistent messaging to the citizens.

ECD should also survey members of the public to better understand how they currently interact with the website, public expectations of website content and usability, and review website analytics to identify the number of visitors, bounce rates, average views per session, total duration, average time on a given page, interactions per visit, and dead pages. ECD should redesign its pages to be consistent with best management practices and to better meet public needs and improve communications/education of the public.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

7.2 **BUILDING AND CODE ENFORCEMENT**

The Building and Code Enforcement Department ensures compliance with the Connecticut State Building Code and the laws and regulations set forth by the Connecticut Department of Public Safety. In this capacity, the Department:

- conducts required inspections of building sites and buildings;
- issues building and all related trade permits;
- issues Certificate of Occupancy after satisfactory completion of all permitted work;
- reviews all applications and drawings for building and safety code compliance; and
- inspects and processes all complaints of building code violations.

The Building and Code Enforcement Department is also responsible for all swimming pools, signs, and tents, and their permits and inspections. The Department ensures the protection of unsafe and hazardous buildings, which includes overseeing all demolition projects. The Department’s Building Official serves as the Chairman of the Condemnation Committee for the City.
In addition, the Department is responsible for all blight enforcement, including violations on private property and in the right of way. The Department also oversees graffiti removal, community clean ups, and neighborhood improvement. Building and Code Enforcement’s department-level organizational structure is provided in Exhibit 7-9.

**Exhibit 7-9**
**Building and Code Enforcement**
**Organizational Chart**

![Organizational Chart]

*Source: Created by Evergreen, January 2022.*

**FINDING**

The Building and Trade Inspectors are not efficient as they are required to conduct both administrative and direct service tasks. The certified Trade Inspectors include electrical, plumbing and Heating Ventilation and Air Conditioning (HVAC). The Inspectors schedule the
inspections, make and answer calls, respond to emails, process payments, and issue permits. The added administrative duties reduce the amount of direct service time available to meet with customers on specific projects and conduct inspections. For example, staff reported not having enough time to conduct a plan review prior to conducting the inspection. Staff reported that some inspections include up to 50 pages of documentation and more than 150 items to check. Staff mentioned voice mails accumulate while the Inspectors are in the field conducting inspections. During the pandemic, duties shifted to the Inspectors and were never reassigned back to the administrative team.

**Exhibit 7-10** shows the Inspector tasks and assignments. The Inspectors conduct both administrative and direct service inspector tasks.

### Exhibit 7-10

**Inspectors Tasks and Assignments**

<table>
<thead>
<tr>
<th>2020-21</th>
</tr>
</thead>
<tbody>
<tr>
<td>Task</td>
</tr>
<tr>
<td>Schedule Appointments</td>
</tr>
<tr>
<td>Correspond with Applicants regarding Appointments</td>
</tr>
<tr>
<td>Receive Emailed Permit Applications</td>
</tr>
<tr>
<td>Respond to Customer Requests for Information</td>
</tr>
<tr>
<td>Process Customer Payments</td>
</tr>
<tr>
<td>Review Submitted Plans and Applications</td>
</tr>
<tr>
<td>Conduct Inspections</td>
</tr>
<tr>
<td>Enter Inspection Results into Municity</td>
</tr>
</tbody>
</table>

*Source: Interviews with City staff, December 2021.*

The Building and Code Enforcement Office’s primary phone number is an automated system and does not ring to the front desk of the office. The Assistant Building Official is the first option to select in the recording and by default receives most of the calls. The Building and Trade Inspectors are also available as options to connect to, but if the customer does not know the trade they need, the options are limited. Pressing zero does not bring the caller to an office attendant, rather it cycles back to the beginning of the message. Without selecting a number, the call ends, resulting in customer frustration.

An automated system can be helpful in connecting the public with the appropriate Inspector but can also result in inefficient practices, “answer shopping” by the public, and aggravation by the public when they are unable to reach the correct staff.

Staff also reported frustration with the process because when customers press a number that is not really intended for that trade, there is more inefficiency, because the customer leaves a message with a question that may not be intended for that trade or Department. Staff reported that they then determine how to handle the customer’s question. Conversely, the Planning and Zoning Office publish a main phone number where the call is answered by an administrative staff who routes the call, as necessary.
Inspectors distracted with administrative assignments reduce the ability to focus on the inspections which increases the risk of a key item during the building inspection being overlooked.

RECOMMENDATION

Recommendation 7-7:

Shift administrative duties to the Administrative Team to allow the certified inspectors to focus on conducting inspections.

The City should assign the administrative duties on a rotating basis to the three non-certified administrative staff. This will reduce the risk of overlooking a key aspect of the inspection and permitting process.

This action will return to the previous practice of the administrative staff being the primary interface with the members of the public, assisting with scheduling, and being the primary receiver of permit fees. The Building and Code Enforcement staff should triage the phone calls. Front office staff can answer fundamental questions and connect callers with the appropriate City staff. This change should allow the Inspectors to focus on their primary role of reviewing plans, meeting with customers, and conducting inspections.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The process to submit a permit application to Building and Code Enforcement is not efficient. The first step for applicants is to submit a permit application. Customers can deliver hard-copy applications, or they can email them. At the time of the onsite fieldwork, customers were limited to only two hours to bring plans and permit applications. The Department was only open for customers from 8:30 am to 10:30 am. The original justification behind the limited drop-off hours was to allow for Inspectors to review the plans, answer questions for the applicant, request additional information, and identify any additional reviews that may be needed depending on the type of project. Since the onsite fieldwork, the Department is now open 8:30 am to 4:00 pm.

Emailing applications is not an efficient practice. Customers submit applications to either a central Department email or to an Inspector’s personal email. For the central email inbox, staff reported that it is inefficient because multiple staff have proxy access to the email. If a staff opens an email, the email shows as being “read” but if the application was not intended for the trade of the staff who opened it, they have to convert the email back to showing as “unread.” There is not a process to forward the email to the staff of the intended trade.

For applications submitted to an individual inspector, there is not an auto-reply message to inform the customer that the Department has received their application via email. The result is
that permit applications may sit as unread email until the staff have an opportunity to open it. For example, one Inspector said that 20 percent of the calls and messages are related to the customer trying to determine if the Department received their application. The result of this method is that if an Inspector is out of the office for vacation, the emailed permit applications sit with no action.

The electronic version of the permit application is read and print only. The applicant can print the hard copy and hand-write the information needed on the form. The form is not a PDF so the applicant cannot type into the form to submit to the Department. The staff reported hand-written forms are often unable to be deciphered, so typed forms are preferred to streamline the application process. The applicant can email the hand-written form, but staff report that many applicants take a cell phone photo to attach in the email, making the form even more challenging to read.

Additionally, the customer service satisfaction is not known by the Department after service is provided. For example, with more than 1,400 building permits issued annually, there is a missed opportunity to improve the service. Management does not necessarily know about complaints or concerns unless they are raised by the customer.

Promptly and efficiently serving residential and commercial customers who interact with the Building and Code Enforcement Department ensures a positive customer experience. The Planning and Zoning Department conducts their permit application process efficiently. Customers who submit applications to the Planning and Zoning Department go to a Department email address and administrative staff review and distribute the emails. The Department opens and processes email daily, including distribution of the permit application.

RECOMMENDATION

Recommendation 7-8:

Revise the permit application process to improve the customer experience with the Building and Code Enforcement Department.

The Department should require electronic permit applications to be emailed to its Department email address. They should add a notice on the website to inform customers that initial project applications should be emailed to the Department’s email address and not directly to Inspectors to ensure timely receipt and processing. The administrative staff should review the application, record the date of receipt, and forward it to the appropriate Inspector.

The Department should revise the permit application form into an interactive PDF form. The Department should modify the instructions to require the applicant to submit the PDF and attach in an email.

Since the City already is licensed for Cityworks, the Building and Code Enforcement Department should coordinate with Planning and Zoning to evaluate if it could be used to populate the receipt of all the permit applications regardless of how they were submitted—hard copy or electronic, for either Department.
The Department should develop a customer service survey and issue it to customers upon successful completion of their receipt of a permit. The Department should use the results to identify opportunities to regularly improve service to customers.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING**

The Code Enforcement Blight Prevention Officer has the authority, but not the ability, to immediately ticket blight offenders. City Ordinance Chapter 58A Blight Prevention identifies the ordinances that apply to the blight prevention program.

Section 58A-3A states:

*The Blight Prevention Officer shall issue a written warning notifying the property owner of a violation of this chapter. Said warning shall detail each finding of blight and the corrective action necessary, and shall provide a reasonable amount of time for the property owner to correct the blight.*

The Mayor, along with the Police Chief, appointed the Blight Prevention Officer as a Special Constable for the purpose of enforcing blight to its maximum. As a Special Constable, the Officer has the authority to immediately issue citations and code violations for blight violations. However, the Officer does not have the ability to produce and issue an actual physical ticket to the property owner. Without a method for the Blight Prevention Officer to issue tickets, the process takes longer as the Officer prepares and mails blight notices to the responsible party.

The Officer shared that the City’s Department of Public Works (DPW) and the Police Department also do not issue paper tickets.

**RECOMMENDATION**

**Recommendation 7-9:**

*Develop a ticketing process for the initial blight warnings.*

This revised process will replace the formal notification process for the blight warning. The Officer should procure the necessary equipment to allow the Officer to immediately issue a ticket to the responsible property owner, record pertinent data, and track issue and resolution dates.

The Officer should collaborate with DPW and the Police Department to identify the best solution to allow the Blight Prevention Officer to efficiently issue tickets to residents.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.
FINDING

The Department duplicates the property title search effort for blight issues that other City departments already provide. The City requests property title searches from external vendors to identify the property owner. Once the Blight Prevention Officer identifies blight, the Officer’s role is to ensure who has ownership interest in the property at a certain address prior to issuing a blight citation. The Department reported that the City’s corporate counsel said that the Department can no longer conduct title searches, but the Department did not provide supporting documentation to Evergreen.

The City pays $75 to $200 per search, with the price depending on the size and scope. The amount of time for a firm to conduct a search varies from 24 hours up to four weeks. They coordinate with three title search firms, but the City does not have a contract with any of them. The staff indicated that the decision on which firm to use depends on who can provide the quickest, most thorough searches. In 2020, the City paid $4,500 for 32 title searches.

The Town Clerk and the City Tax Collector have information on all the properties in the City. The land records analyst in the Office of the Town Clerk records all property ownership changes. Paying for a service that is available internally is an inefficient use of limited city resources.

RECOMMENDATION

Recommendation 7-10:

Evaluate the external blight program title searches to determine if the Corporate Council could reconsider the opportunity to have City departments conduct property ownership title searches.

The Officer could coordinate with the Town Clerk and the Tax Collector to determine the most appropriate method to request title search services.

FISCAL IMPACT

The fiscal impact assumes an annual savings from eliminating the external title searches. The savings is based on the same number and cost incurred in 2020, which was 32 title searches at a cost of $4,500.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eliminate the External Blight Program</td>
<td>$4,500</td>
<td>$4,500</td>
<td>$4,500</td>
<td>$4,500</td>
<td>$4,500</td>
</tr>
<tr>
<td>Title Searches</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

FINDING

Approximately 200 research requests are received monthly by the Building and Code Enforcement Department. Communicating with the public and conducting the research is primarily the responsibility of one position. Staff have developed a detailed tracking system and
log of all research requests received. The requestor contact information is recorded, along with invoice amount, and date completed. The type of data recorded and approach to completing the research could serve as a model for other Departments.

**COMMENDATION**

The detailed organization and recordkeeping of research activities has ensured that patrons promptly receive requested information.

### 7.3 BUSINESS DEVELOPMENT AND TOURISM

The Business Development and Tourism (BDT) Department was newly created in 2019 and consists of one position. BDT acts as the main point of contact for both new and existing business for interaction with the City of Norwalk. The Department provides support, retention, expansion for existing businesses, and start-up and relocation assistance for new businesses. They also advise on technical assistance related to permitting. The Department supports tourism through promotion of businesses and community assets that are intended to attract people to Norwalk. This comes in the form of event planning, consistent messaging, and marketing efforts.

Based on the Mayor’s Dashboard, in FY 21, there were 332 new Norwalk businesses.

From the City’s FY 22 approved operating budget, the highlights for 2020-21 and the goals for 2021-22 include the following:

#### 2020-21 Highlights

- Created and implemented a business outreach marketing strategy to attract new companies and businesses to Norwalk.
- Created and implemented a tourism branding and marketing strategy.
- Organized events to bring residents and visitors into Norwalk neighborhoods and businesses.
- Created and implemented the Small Business and Main Streets Program which included a Storefront Improvement matching grant program.
- Implemented a Business Roundtable program to get input from and to inform businesses.
- Spoke to and assisted over 250 businesses in Norwalk or wishing to move to Norwalk.
- Assisted in the creation of an expedited, online, outdoor dining approval process and associated guidelines.
- Expanded the Enterprise Zone Program to Census Tract 437 (Wall Street-West Avenue)
- Created a COVID-19 Business Resources page on the City’s website to act as a catch-all for all business-related COVID-19 information.
- Supported 30 small businesses with a $5,000 grant, through a COVID Small Business grant program.
- Received a $3M grant from the State of Connecticut in support of the MLK Corridor Initiative.
2021-22 Goals

- Attract new businesses to Norwalk.
- Retain businesses in Norwalk.
- Create a stable pipeline of communication with local businesses and City Hall.
- Implement an effective marketing strategy to draw businesses and visitors to Norwalk.
- Analyze and implement business incentives that create a strong economic return (job growth, grand list, etc.).
- Work towards streamlining and digitizing permitting processes for opening a business and for special events.
- Formulate a user-friendly Economic Development website to create a one-stop-shop for businesses.
- Create and market a cohesive tourism strategy to draw visitors to Norwalk.
- Manage events to draw people to Norwalk neighborhoods and patronize Norwalk businesses.

FINDING

The Department has expanded the Enterprise Zone Program. Since 1982, the City has had Enterprise Zone benefits in South Norwalk. Since its inception, four properties have taken advantage of the program. The Department initiated an expansion of the Enterprise Zone to spark growth, business support and attraction to the downtown neighborhoods of South Norwalk and Wall Street-West Avenue.

The Department developed a mapping tool (Exhibit 7-11) to locate properties within the Enterprise Zone. Interested parties can use the tool to expand the frequency of transformational projects and provide new opportunities in the Wall Street-West Avenue neighborhood. The map identifies the property that is eligible to have its property value assessment fixed for seven years from the time of the improvement according to this schedule: Enterprise Zone | Norwalk, CT - Official Website (civicplus.com)

Exhibit 7-11
Enterprise Zone Map

Source: https://www.google.com/maps/d/u/0/viewer?mid=1W4Tw5LODTkly4bqfoUMKeLYjmp8Ijypk&ll=41.105217694249825%2C-73.4204597&z=13
The map identifies the property that is eligible to have its property value assessment fixed for seven years from the time of the improvement according to this schedule: [Enterprise Zone | Norwalk, CT - Official Website (civicplus.com)]

COMMENDATION

The Department expanded the Enterprise Zone initiative to open opportunities in the downtown neighborhoods of South Norwalk and Wall Street-West Avenue.

FINDING

The Department’s roles and responsibilities have shifted since its inception, resulting in challenges to implement all the programs and initiatives with limited staff. Although there was a 2015 – 2020 Economic Development Action Plan, it has not served as the Department’s strategic marketing plan or operating plan to attract new businesses or plan to address existing businesses’ needs. Since 2020, the Department has focused on COVID support with loan applications, grant applications, and communications regarding changing state policies and guidelines related to tourism.

The Department reported their focus on the following projects and programs:

- The Small Business and Main Streets Program (provides grants to small businesses and neighborhoods supporting funding to aid in the draw of people to Norwalk businesses).

- Visit Norwalk and the associated aggressive marketing campaign that has thousands of new impressions per month and has helped to bring in hundreds of out of towners to Norwalk.

- New programming from the Small Business Center that will provide both technical and financial assistance to businesses by staff.

- Art installations to add to the City’s public art collection through the Arts Commission that is staffed and project managed by staff in the Department.

- Special events coordination, including additional staff to take over the permitting process and assist implementers in their application, and coordinate city-funded events.

- Film permits have now been implemented online so that staff can coordinate across departments. The Department assists in location possibilities.

- The Department is coordinating in FY 23-24 online permitted and licensing including a business navigation tool. This will be the main project for the new permit coordinator position who will be overseen by the Department.
On the City’s website, unlike other Departments within ECD, BDT’s landing page only provides minimal information to the general public, existing businesses, or potential new businesses. There is also limited information for businesses or partners interested in developing tourism opportunities. The website does not contain information related to necessary event permits, processes, or procedures for hosting events. The website also does not include information that is directed at businesses to provide information on why Norwalk is a good place to open or expand a business. Exhibit 7-12 provides a screen shot of the webpage.

Exhibit 7-12
Business Development and Tourism Webpage

Source: City of Norwalk Website 2022: https://www.norwalkct.org/1864/Business-Development-Tourism
The Department has acknowledged the shortcomings of the website and have initiated improvements to provide more information. For example, the Department’s goal is to outline all city processes and functions of all Economic and Community Development departments, assisted by a marketing campaign. There is a current budget request to create new positions to assist with permit coordination, and program implementation.

Websites provide an effective communication tool and is an efficient way to share information; not having this information readily available to potential business stakeholders puts the City of Norwalk at a disadvantage when competing with neighboring municipalities.

Neighboring municipalities have created web pages that provide businesses with information on relocating or starting businesses within the City, with demographic information, event hosting, filming, and information on transportation and infrastructure.

The City of Stamford, CT, is one example of a neighboring municipality that provides this information on a public facing web page, as shown in Exhibit 7-13. There is also a direct link to the page on the City’s main landing page.

Exhibit 7-13
City of Stamford Webpage

Businesses have easy access to information related to:

- work/life balance;
- current data on business sectors, transportation, and manufacturing;
- demographic data;
- tourism maps;
- filming in the City;
- business incentives;
- tax incentives;
- GIS data;
- commercial offices inventory maps;
- reports and Marketing data;
- quarterly economic reports;
- information on opening a business and a starter kit for new businesses;
- information on buying an existing business;
- disaster preparedness; and
- contact information.

**RECOMMENDATION**

**Recommendation 7-11:**

Incorporate the Department’s ongoing initiatives into a planning document with a corresponding Department website to inform the public.

To meet the needs of existing businesses, the Department should survey businesses to better understand needs and expectations.

The Department should evaluate the accomplishment/outcomes of the identified goals and key actions from Economic Development Action Plan 2015 – 2020 to help inform the development of future plans. The plan should connect to the City’s Strategic Plan by including actionable elements that are measurable and will achieve defined goals within a defined timeframe. The Department’s operational plans should provide specific approaches and targets in the areas of business development and tourism.

The Department should amend its primary landing web page that highlights and promotes the benefits of doing business in the City of Norwalk. **Chapter 2** of this report includes recommendations regarding improving the communications function and the webmaster. Once this is developed, the Economic and Community Development Department should coordinate with these positions to identify and revise the department-level webpages to ensure the City is delivering consistent messaging to the citizens.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.
7.4 PLANNING AND ZONING

The Planning and Zoning Department guides the growth and development in the City. The Department provides information, guidance, and administrative support to the Zoning Board of Appeals, Zoning Commission, Planning Commission, and Harbor Management Commission. Planning and Zoning assists the Land Use Commissions in establishing the long-term vision for the City by implementing the goals outlined in the Plan of Conservation and Development. The Department conducts planning studies related to traffic, parking, housing, urban design, mobility, resiliency, economic development, etc. as directed by the Commissions and/or the legislative body. Planning and Zoning provides objective information to residents and applicants on matters regarding land use. The Department reviews and processes applications, administers and enforces Zoning and Subdivision regulations.

In addition, the Department houses the Conservation Office which administers and enforces the regulations and policies associated with the Aquifer Protection Agency, the Conservation Commission, and the Inland Wetland Agency. The Office administers the City’s Inland Wetland Regulations, which regulate activities adjacent to inland wetlands and watercourses in order to protect water resources. The Office also oversees certain potentially hazardous land uses in the public drinking water supply areas in the City and provides recommendations on natural resources and open space plans.

The Planning and Zoning Department’s organizational structure is provided in Exhibit 7-14.

Exhibit 7-14
Planning and Zoning Organizational Chart

Source: Created by Evergreen, January 2022.
FINDING

The span of control for the Planning and Zoning Department’s Director and Assistant Director is not consistent and equitably divided. There are 13 staff and two directors in the Department. The director manages three staff, while the assistant director inequitably manages 10 staff.

The Director leads the Department’s efforts related to planning and zoning, while the Assistant Director leads the efforts related to conservation and provides assistance on administrative oversight.

There is some inconsistency in various City documents regarding these director-level positions. The organization chart cites the assistant director position as the assistant director of Planning and Zoning. However, the staff directory on the Department’s webpage calls the position the senior environmental officer with no mention of an assistant director. The City’s salary schedule lists a joint title.

Span of control refers to the number of staff a supervisor manages. The Human Resource Management Practice is an HR resource that says, “the optimum span of control depends on numerous variables including organizational structure, available technology, the functions being performed, and the competencies of the manager as well as staff.”

RECOMMENDATION

Recommendation 7-12:

Shift the number of staff positions reporting to both the Director and the Assistant Director to equitably assign the Department’s functions.

The Department should review and evaluate each of the position to shift equity in responsibilities and functions.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The Planning and Zoning Department lacks a process to determine the appropriate number of needed staff. The number of Planning and Zoning Department permit applications does not align with the number of planners and inspectors available. The Department receives approximately 1,400 permit applications annually; during Evergreen onsite meetings, staff reported that current year applications totaled approximately 1,500.

Inspectors also noted that they currently have a backlog in violation reports and inspections of 188 sites. It takes approximately three weeks for staff to review and approve a zoning application and issue a permit.
Between application submittals, reviews, meetings with the public, and field investigations staff stated that the number of available staff is not consistent with the number of staff needed to efficiently process the backlog of applications and to address the increasing number of inspections.

The Planning and Zoning Department estimates of the increase in applications received is supported by the documented number of permits issued over the past 18 months. Exhibit 7-15 shows the increasing trend of permits issued between FY 21-22 compared to the first two quarters of FY 21.

Exhibit 7-15
Planning and Zoning Permits
FY 21 and 22

Based on the data provided, 232 more permits were issued during July 2021 – December 2021 than during the same period the previous year.

RECOMMENDATION

Recommendation 7-13:

Monitor permit application and inspection workload in FY 22 to determine if additional staff are warranted.

While permit applications have increased over the past two years, there is a potential that this trend will normalize. The Department should track the number of permit applications received
and issued over the next year and evaluate whether the number of staff are properly aligned with workload.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

7.5 TRANSPORTATION, MOBILITY AND PARKING

Transportation, Mobility and Parking (TMP) establishes policies, programs, and initiatives that address the City’s needs for connectivity between neighborhoods and the business districts, provides sustainable transportation, and coordinated transportation planning, design, engineering, and construction; along with maintenance and state of good repair.

TMP implements projects and programs related to:

- enhancing safety;
- increasing livability;
- improving traffic flow;
- providing Complete Streets for all users where feasible;
- delivering safe routes to schools;
- addressing parking capacity on and off streets;
- meeting ADA and accessibility needs; and
- arranging mobility alternatives through programs and methods such as bike share, walkability initiatives, autonomous vehicles, on-demand transportation, and micro-transit mobility.

TMP also oversees the citywide traffic operations. TMP develops and implements programs to improve the business climate through wayfinding, traffic flow, and parking, through various field and outreach programs, technology, and equitable mobility options. TMP collaborates and coordinates with city, state, and federal agencies, city departments, and private entities to create short- and long-term transportation, mobility and parking planning needs. They provide staffing to the Norwalk Parking Authority, Norwalk Traffic Authority and Bike Walk Commission.

TMP identifies and implements initiatives through close collaborations with functional partners such as Norwalk Transit District, Department of Operations and Public Works, Planning and Zoning Department, Economic Development, Norwalk Redevelopment Agency, Norwalk Public Schools, Norwalk Department of Health, Connecticut Department of Transportation, and WestCOG, as well as constituents, developers, and businesses.

Through a partnership with the Norwalk Parking Authority, the City provides public parking in 15 lots/garages as well as on street parking in areas that are close to points of interest and train stations throughout the City. Members of the public access real-time parking availability online, a map of parking locations, fees, prepay for parking services, and purchase permits. The online site also includes an interactive map that allows individuals to search for local areas of interest.
and identify parking that is close. The daily management of these parking areas and facilities is conducted via a third-party service contract.

From the City’s FY 22 approved operating budget, the highlights for 2020-21 and the goals for 2021-22 include the following:

**2020-21 Highlights**

- Continue citywide traffic signal upgrade program and evaluate adaptive system installations.
- Obtained a Green Infrastructure grant through the Long Island Sound Initiative for a water quality stormwater installation in the Webster Parking Lot.
- Implemented Parking Management Program in the Wall Street District.
- Installed various new sidewalks and crosswalks to ensure safety for all.
- Updated and installed adaptive signals from the SoNo Collective to Orchard Street.
- Continue to expand the Norwalk River Valley Trail.
- Collaborating with the Transit District expanded the Wheels2U on-demand shuttle service.
- Installed Connecticut's first rainbow crosswalk on West Avenue.

**2021-22 Goals**

- Adopt a Complete Streets policy, including a set of standards and guidelines.
- Create Vision Zero actionable items working with the community task force.
- Update the Transportation Master Plan.
- Develop a new sidewalk priority plan working with the pedestrian committee.
- Develop bike route priority plan working with the bike walk commission.
- Complete the installation of Green Infrastructure water quality stormwater project at the Webster Parking Lot collaboration with DPW.
- Evaluate a Residential Parking Permit Program.
- Evaluate wayfinding and branding parking facility installation.
- Continue to advise on transportation, mobility and parking improvements related to development in the City.
- Continue citywide traffic signal upgrade program and evaluate adaptive system installations.
- Continue to work with the Transit District to expand the Wheels2U on-demand shuttle service.

The Transportation, Mobility and Parking Department’s organizational structure is provided in Exhibit 7-16.
FINDING

The Department has initiated a series of projects and programs that has resulted in positive success for the City. The Department reported the following:

- **Site Plan Review.** The Department has secured nearly $700,000 in betterments within the prior 12 months, which included infrastructure investments, improvements, and project plans.

- **Citizen Requests.** The Department utilizes the on-line citizen inquiries, as well as phone calls and emails to review concerns regarding, for example, parking, speeding, sidewalk requests, and safety concerns.

- **Roadway (Right of Way) Design.** The Department identifies opportunities for Right of Way improvements by citizens and elected official inquiries, field observations, crash data, and traffic analysis to identify opportunities to improve roadway design through
construction, pavement markings, signage, and other related traffic control. TMP is responsible for all traffic calming, and the design and installation of all new sidewalks.

- **Construction Oversight.** The Department is responsible for all construction management, administration, and oversight relating to any projects initiated through TMP. These can be Capital and Grant Funded projects as well as maintenance and state of good repair operating expenses.

- **Grants.** The Department identifies opportunities for Federal, State, Local, and PPP grant sources and research, writes, and communicates with funders to secure funding for future projects. Grants have become increasingly more competitive, and the application process is long and laborious. The Department reported that it cannot be understated the amount of time it takes to complete a grant application, whether successful or not.

- **Grant Reconciliation:** While submitting a successful grant application is time consuming, it cannot be understated the amount of time that is required for on-going grant reconciliation for all approved grants. There are various requirements for each grant received and the successful reimbursement of these grants are dependent on the Department meeting all the requirements and timelines for submission and reimbursement.

- **Public Relations.** The Department readily meets with constituents on a regular basis. These occur through community meetings, one-on-one meetings at a constituent’s house or property, and field meetings. The Department values openness, accessibility, honesty, and integrity, and remains available to meet with residents, businesses, and visitors to understand their concerns.

- **State Relations.** The Department regularly engages with functional partners such as CTDOT and elected representatives to further the mission to provide a safe and effective transportation network.

- **Technology.** The Department is continually investigating and researching best practices as it relates to the implementation of technology for all aspects of the Department’s areas of responsibility and works with functional partners who share a common interest. The Department cited the following examples:
  - **Installation of CCTV cameras for traffic management:** The Department has partnered with the Norwalk Police Department to offer access to these cameras for police investigations.
  - **Transit Bus Signal Prioritization:** The Department is partnering with the Norwalk Transit District to allow their buses access to technology that will offer NTD buses traffic signal priority to decrease ridership time.
  - **Adaptive Traffic Signal implementation:** Norwalk is the first City in the state to introduce this new technology that will over time decrease travel time and reduce the ongoing expense of retiming the City’s traffic signals.
- **Fiber Optic Cabling installation:** The Department continues to connect all the City-owned traffic signals to the City’s Traffic Operations Center through the installation of fiber optic cable. This will not only create a more reliable system but will set the stage for early adoption of connected and autonomous vehicles in the future.

- **Strategic Planning.** To ensure the Department remains good stewards of constituent tax dollars, the Department reported that it is currently undertaking several long-term planning strategies that are in place to set the framework of the Department’s work to ensure transparency in the Department’s values, practices, and plans. The Department is currently in the midst of updating the City’s Transportation Master Plan, and in the planning stages for adoption of Complete Streets Legislation and Design Manual, Vision Zero Policy and Plan, Updating the Bike/Walk Plan, and a creation of a Citywide Street Sign Style Guide.

- **Street Light Maintenance.** The Department is responsible for the inventory and ownership of all street lighting throughout the City. Additionally, the Department is responsible for the maintenance of all city-owned street and pedestrian lighting fixtures.

- **Parking Operations.** The Department guides the Norwalk Parking Authority in their oversight of on street and off-street public parking throughout the City. Currently initiatives include the rebranding to Park Norwalk, Facility Capital Repairs, including undertaking improvements to the SoNo Train Station; Yankee Doodle Garage facade; and Haviland Parking Deck improvements.

- **Financial Reconciliation.** Oversight of the operating budget for the Norwalk Parking Authority parking programs. The Department is identifying opportunities for best practices in parking to aid businesses and users to create a state-of-the-art parking system.

- **EV Charging.** The Department is ensuring the City is providing opportunities for EV changing in City facilities.

- **Wayfinding.** The Department is identifying branding and opportunities to ensure visitors can readily find parking when coming to the City.

- **Traffic Signal Operations.** The Department manages and oversees all aspects of the city-owned 90 signalized intersections, as well as working with the Connecticut Department of Transportation on the 52 signalized intersections that the State owns and manages. The Department also manages the City’s Traffic Operations Center, which is responsible for the coordination, optimization, and maintenance of all traffic signals and city fiber optic cabling. This includes implementation of state-of-the-art systems that include the first implementation of adaptive traffic control systems in the state, bus transit prioritization, and a migration to concurrent pedestrian signalization.

- **Pavement Markings and Traffic Signage.** The Department oversees the installation and maintenance of all pavement markings on 280 miles of city streets. These include center lines, stop bars, crosswalks, bike lanes, parking lanes, symbols, legends and directional
markings. In addition, the Department oversees the installation and maintenance of all curbside traffic control, regulatory, and parking and guide signage.

The Department also reported that they are currently in the process of updating the Transportation Management Plan and are soliciting input from residents, businesses, visitors, and other interested parties regarding the transportation system in Norwalk.

As part of this process, a short questionnaire has been developed to gather public perceptions regarding the short-term and long-term walking, biking, automotive, and public transit transportation needs in Norwalk. The results of this survey will inform the Department’s long-term planning efforts and help to identify improvements needed over the next 10 to 15 years to create safe, efficient, and equitable travel for all. The survey is located at: https://www.fhistudio-apps.com/norwalk-tmp/

COMMENDATION

The Transportation, Mobility and Parking Department’s focus on a series of initiatives has resulted in positive success.

FINDING

The Department lacks the resources necessary to implement a $17.2 million backlog of 13 previously awarded grants. Exhibit 7-17 is the list of grants the Department provided.

Exhibit 7-17
Grants Backlog - March 2022

<table>
<thead>
<tr>
<th>Name of Grant Project</th>
<th>Grant Project Number</th>
<th>Grant Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Phase 4 Traffic Signal upgrade</td>
<td>102-360</td>
<td>$4,000,000</td>
</tr>
<tr>
<td>Traffic Signal Modernization Phase 5 (recent award)</td>
<td>N/A</td>
<td>$3,400,000</td>
</tr>
<tr>
<td>SONO Pedestrian and Streetscape Improvements</td>
<td>102-L0001</td>
<td>$2,500,000</td>
</tr>
<tr>
<td>West Rock Sidewalk installation</td>
<td>Project Fed App</td>
<td>$1,500,000</td>
</tr>
<tr>
<td>East Wall Street Improvements</td>
<td>L102-0004</td>
<td>$1,500,000</td>
</tr>
<tr>
<td>ARPA Funded Sidewalks</td>
<td>N/A</td>
<td>$1,000,000</td>
</tr>
<tr>
<td>Hamilton Ave Staircase</td>
<td>Project MLK Fund</td>
<td>$750,000</td>
</tr>
<tr>
<td>MLK Funded Sidewalks and Crosswalks with street trees</td>
<td>Project MLK Fund</td>
<td>$650,000</td>
</tr>
<tr>
<td>Washington St over-height detection system</td>
<td>102-362</td>
<td>$600,000</td>
</tr>
<tr>
<td>Highland @ Flax Hill intersection improvements</td>
<td>102-359</td>
<td>$500,000</td>
</tr>
<tr>
<td>Norwalk Bicycle and Pedestrian Connectivity Project</td>
<td>170-3513</td>
<td>$300,000</td>
</tr>
<tr>
<td>West Rock Corridor Traffic Calming Project</td>
<td>102-365</td>
<td>$250,000</td>
</tr>
<tr>
<td>West Ave / Belden Ave Adaptive Traffic Signal Upgrade</td>
<td>102-364</td>
<td>$250,000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td><strong>$17,200,000</strong></td>
</tr>
</tbody>
</table>

Source: Transportation, Mobility and Parking, March 2022.
The Department also applies for new grant opportunities. Once approved, the City is committed to accomplishing these objectives outlined in the grant. For example, the Department reported that they are currently in design of Wall Street Corridor Improvements. This is a decades old initiative to reimagine the Greater Wall Street Area. The City is investing approximately $400,000 to work with the community to redesign the corridor. Phase 1 Design will be complete by the end of Summer 2022 and is grant funded at $1.5 million. Phase 2 Design is currently in process, and the Department will be working with the community and the consultant over the next 12-18 months to finalize these plans.

To ensure the Department’s commitment to implementing the completion of the additional phases of the plan, the Department has worked with the state delegation in an attempt to secure $3.5 million in state appropriations, as well as other grants that the Department has written, including one for $4 million and one for $12 million. In addition, there is approximately $2.3 million in City Capital funds to implement various roadway and Right of Way improvements citywide.

The projects are typically structured where TMP manages the projects, but contract for most of the work. However, the Department has insufficient staff to manage the number of projects they have in place. They do not have a project manager position to oversee the work of the contractors, nor do they have someone for construction inspection. The Department reported that the previously awarded grants did not include any support staff or construction oversight as part of the initial request. They currently attempt to include construction oversight as a reimbursable expense on new grants, but that option is not always allowed by the grantor. Grant funds typically cannot be used for staff salaries, so the Department attempts to dedicate a portion of some grants to project management.

Organizations with an appropriate level of staff allow the ability to manage and direct existing projects while simultaneously identifying funding opportunities for future projects. The Department said that grant funding through the Council of Governments is prioritized by density in population. Historically, Norwalk has been underfunded in grant awards based on the City’s inability to commit resources to new projects because of the limited number of staff. An appropriate staffing level would provide opportunities for significant infrastructure funding, allowing the Department to position the City to successfully compete for these competitive funds.

Without additional staff, the Department will continue to struggle to implement both the backlog of grants, as well as the current grants.

**RECOMMENDATION**

**Recommendation 7-14:**

Prepare a comprehensive, prioritized list of the grant backlog and current ongoing projects, and assign staff or contract project managers to each grant and project with a goal of clearing the backlog with the next two years.
During the assessment process, the Department and other impacted City departments should closely evaluate the older grants to determine if the intended purpose of the grant remains consistent with the priorities and goals of the City today. If they do not, and they cannot be modified to address current needs, the Department should withdraw the grants. The Department should prioritize the grants that remain appropriate and necessary with planned timelines, and they should identify the needed internal resources. The Department should identify and implement contract services that are needed.

Based on TMP’s current staffing level, the Department should request a new position of a project manager with an engineering credential to implement this recommendation. Once the backlog is cleared, this position should conduct advanced planning and design work for future grants. Additional staff could also assist with the numerous citizen service inquiries the Department receives.

**FISCAL IMPACT**

The fiscal impact is the cost of a Project Manager with an engineering credential. The current salary of junior engineers based on the City salary schedule is $92,281. Therefore, with 69.89 percent benefits of $64,495, the total annual cost will be $156,778.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hire a Project Manager to Assist in Clearing the</td>
<td>($156,778)</td>
<td>($156,778)</td>
<td>($156,778)</td>
<td>($156,778)</td>
<td>($156,778)</td>
</tr>
<tr>
<td>Grants Backlog</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**FINDING**

The City lacks a modernized design standard for street designs or design standards, which has led to some inconsistency between and among departments charged with City development. The approach to construction and maintenance of public roadways and sidewalks is not defined.

The City provided examples where conflicts exist with the objectives of the Plan of Conservation and Development and/or there are no standard practices in place because the City has not adopted a modernized standard for street design. For example, some new streets are too narrow with insufficient room for fire trucks and ambulances to get through and respond to calls. Other examples relate to the use of tree-lined streets. There are currently no or minimal trees between the sidewalk and the street. Without a street design standard, there is a lack of clarity on whether there will be tree-lined streets in the grassy strip, or if this will be considered the “snow shelf.” The size of the sidewalks was another example mentioned. Some sidewalks are five feet, while others are seven feet.

The Department referenced a Roadway Standards Manual from the 1990s. However, the Department said that Complete Streets is a commonly accepted current standard for street designs. The 2012 Transportation Master Plan is a framework, but it does not say how the City wants streets to look like.
The National Association of City Transportation Officials (https://nacto.org/publication/urban-street-design-guide/street-design-elements/) provides guidance on establishing standards that transportation planners and engineers can use to optimize the benefits the community receives from its streets. Some of the elements for consideration include but are not limited to:

- Lane width
- The inclusion of bike lanes
- Sidewalk width, depth and construction specifications
- Curb, curb extensions and gateways
- Medians
- Turn lanes
- Signage

While organizations publish guidance relating to the most optimum manner in which to build streets, curbs, and the like, each City faces unique environmental issues, community expectations and levels of need. If, for example, bicycling is important to the community, a standard may be to create bike lanes of a given width, marking and signage for every new street, except in instances where a bike lane is not possible.

The 2010 City of New Haven Complete Streets design manual is a 117-page resource for standardizing street designs. It is a comprehensive summary of the key components of a Complete Streets program. The Manual includes the following nine categories:

- Policy & Ordinance
- New Haven Context (Infrastructure, Demographics, Safety Concerns and Community Involvement)
- What are Complete Streets?
- Why Complete Streets?
- Street Design Process
- Engineering Considerations for Complete Streets
- How to Create Complete Streets
- Measurement: Making it Count
- Funding, Future Strategy & Review Process

To illustrate the implementation of such standards, the City of Sacramento, California has street design standards, and the preamble to the policy states the following:


The purpose of this section is to provide design engineers with the City’s street standards that are to be used in the preparation of plans, specifications and estimates for projects within the City right of way. The primary objective of these standards is to ensure the safe and efficient movement of motor vehicles, bicycles, and pedestrians; and to be considerate of future maintenance costs to sustain desired levels of service.
Development projects are sometimes approved incorporating modified street sections or design elements that are not City design standards. If a design element is not a City standard, an appropriate Caltrans or AASHTO standard is to be applied. Design features not addressed by Caltrans or AASHTO standards shall be designed consistent with standard engineering practices.

RECOMMENDATION

Recommendation 7-15:

Create and adopt design standards for City streets-public right of way, which accommodates all road users, in collaboration with Engineering, Public Works and stakeholders from various boards and commissions.

Developing street design standards will ensure consistency across the City.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The City lacks both standards and an inventory for signage and pavement markings in the City. The Department is responsible for the citywide signage program and roadway markings for approximately 280 miles of roads throughout the City.

The Department is challenged to respond in a timely manner to knockdowns, as well as programs and services that directly benefit residents, including, for example, on-street handicap parking and residential parking programs. There is often a delay in responding to inquiries and the Department is not proactive in addressing the traffic and parking demands of a growing City.

The Department reported that since the time when the City installed many of its existing signs, now the vision, desire, use, and operations of the roadways have fundamentally changed. This requires the installation, replacement and upgrades to a significant amount of curbside signage. Contributing to the challenges relates to staffing. The Department does not have staff or contractors assigned to oversee the program. As a result, management and professional engineers perform basic tasks such as measuring the roadway or overseeing painting contractors in marking the streets. This staffing method is not efficient.

Appropriate oversight of the program would ensure that the following tasks are conducted:

- managing 280 miles of roadway signs and pavement markings;
- installation and State of Good Repair for all regulatory signs. These signs have federal guidelines that require the Department to manage and update the reflectivity of this signage;
• installation and State of Good Repair for all parking and wayfinding signage;

• oversight of the contract for Citywide Pavement Markings. This is a recurring City expense line item that has direct safety benefits;

• gather data and respond to citizen inquiries for all signs and pavement markings issues; and

• rollout and management of the new street sign style guide for consistency of all right of way signage that has been developed by the Department.

Public Works has in the past handled much of the sign maintenance functions at the request of TMP; however, this process lacks the dedicated staff with the expertise to perform the consistency, standardization, and legal requirements of these functions. Contract management of a vendor may be appropriately placed in that department, or could be managed by TMP.

RECOMMENDATION

Recommendation 7-16:

Contract for oversight of the Signage and Pavement Markings Program.

The Department should identify the roles and responsibilities for a sign crew and determine the appropriate method for maintaining the program as well as the most appropriate department for these maintenance activities to be performed.

FISCAL IMPACT

The fiscal impact of contracting for sign management services cannot be determined until the signage replacement program is completed and the total number of signs is inventoried.

FINDING

The City’s public parking areas generate significant revenues; however, additional oversight of the program is needed. The City owns 15 public parking lots and garages that are operated and maintained under a contract with the same vendor that the City approved originally in 2004. The City has renewed this contract six times over the last 20 years with the same vendor.

Management said the contract has been renewed without the benefit of a Request for Proposals to determine if the same service could be provided by a different vendor at a lower cost or provided in a way that increased the revenue generated for the City.

Exhibit 7-18 provides a comparison of total revenues received from parking areas from FY 19 through the first three quarters of FY 21.
Exhibit 7-18
Summary of Total Parking Revenues
FY 19, FY 20, and FY 21

Exhibit 7-19 provides a summary of revenues and expenses for FY 21. Historical records were not immediately available. However, based on staff interviews, net revenues from the parking contract do not appear to have provided a significant source of funds for the City.

Exhibit 7-19
Financial Summary Report of Parking Revenues and Fund Balance
July 2020 through March 2021

The period of service for the second contract that was executed in April 2010 expired and was extended four times to a period of June 30, 2021. The contract has since continued on a month-to-month basis. The scope of work requires the vendor to provide staff to oversee facilities, issue citations, and provide standard meters and electronic payment meter systems. According to the March 2021 Quarterly Report that is available online, a total of 4,425 garage/lot parking spaces and street side parking spaces are managed under the contract. The vendor is required to provide “regular” reports to the City, along with invoices and associated documentation.
The contract terms include the following compensation terms for the contractor:

**Article 3**

The Contractor’s Management Fee shall continue to be paid during the extended term of the agreement in the amount of One Hundred Thousand Dollars and 00/100 ($100,000) for each twelve-month period of the extended term and shall continue to be paid in twelve equal installments based upon the agreed upon schedule. Additionally, the Incentive Fee calculation set forth in the First Amendment will be replaced by an agreed upon performance measurement metric which, once finalized will be attached hereto and incorporated herein by reference.

**Article 4**

The original agreement is hereby amended to provide that the term of the original agreement is hereby extended retroactively through June 31, 2021. This term may be further extended by agreement of the parties for an additional two-year period until June 30, 2023. Any such agreement will be set out in a letter signed by both parties and attached hereto.

Best management practices for multi-year contracts that are awarded by government agencies suggest that contracts be limited to five-year terms. According to both the National Association of State Procurement Officials and the US Office of Personnel Management (OPM) multi-year contracts should be periodically evaluated to determine if there is a need to update terms and conditions, modify the scope, audit expenditures, and determine if the original need continues to exist. For recurring supplies or services, the OPM recommends that agencies consider competition and small business participation in providing government and community services.

**RECOMMENDATION**

Recommendation 7-17:

Competitively bid the Parking contract and look for ways to control City costs and maximize revenues, prior to renewing the current Parking contract.

Transportation, Mobility and Parking should coordinate with Purchasing to develop a Request for Proposals to allow for competition among vendors to manage operations at all city parking areas. TMP should also evaluate the cost sharing percentage for parking fees and citations that are generated from the parking areas.

The contract should be rebid at least every five years.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources, but competitive bidding could result in savings or additional revenues for the City.
CHAPTER 8:
OPERATIONS AND PUBLIC WORKS
8.0 OPERATIONS AND PUBLIC WORKS

Operations departments in small local governments many times present the public “face” of a local government. Citizens, business owners, and visitors interact with these departments on a regular basis to learn about and benefit from public services and amenities. Moreover, a variety of studies indicate that these interactions define the perception of the efficiency and effectiveness of the local government since it may be one of the primary points of interaction between municipal services and the public. In other words, when a citizen contacts an operations department to resolve an issue, that interaction not only leads to a specific perception of that department, but also the municipality, as a whole.

While a primary focus of operations is to provide the infrastructure necessary to support the quality of life in the community, it also supports the operations of other municipal departments. This dual role necessitates a strong focus on internal as well as external customer needs and expectations in service availability, quality, and affordability. Moreover, a key part of meeting needs and expectations is finding the appropriate balance between providing services that are perceived as core or basic services vis-à-vis higher cost services that might require more resources and more diligent maintenance.

Some of the major operational challenges faced by most municipal leaders include:

- growing demand for services in an environment of greater focus on doing more with less;
- aging infrastructure that necessitates greater maintenance and updating in order to maintain the same level of service;
- transitioning workforce that has created pressure to increase skills and capabilities, while supply of available candidates has fallen behind demand;
- increasing environmental and regulatory changes that necessitate more aggressive action to address needs; and
- expanding technological requirements and demands that not only provide customer access to information, but also increase transparency while enhancing productivity and effectiveness.

While this chapter does not address every challenge facing the City’s Operations and Public Works (OPW) Department, it does address a variety of macro issues that impact internal as well as external support functions that not only enhance the quality of life of the citizens as well as visitors, but also provides the infrastructure for enabling other departments to operate efficiently and effectively.

This chapter is divided into the following seven sections:

8.1 Organization and Management
8.2 Strategy
8.3 Engineering Department
8.4 Operations Department
8.5 Norwalk Water Pollution Control Authority (WPCA)
8.6 Facilities Department
8.7 Recreation and Parks Department

8.1 ORGANIZATION AND MANAGEMENT

As part of the City’s effort to reduce the number of direct reports to the Mayor and create opportunities for resource sharing among similarly aligned service areas, most of the major field functions were combined under a Chief of Operations and Public Works.

Exhibit 8-1 summaries the reporting structure and senior management of each department. While the combination of services creates opportunity for collaboration, it also joins services that typically possess its own separate identity, such as parks and recreation.

Exhibit 8-1
OPW Organizational Chart

Source: Created by Evergreen from OPW documents, 2022.

A brief summary of the purpose and role of each department appears in Exhibit 8-2. It is important to note that Building Maintenance as well as the Water Pollution Control Authority (WCPA) outsource the labor necessary for service delivery, while Recreation and Parks and Operations leverage internal maintenance staff.


Exhibit 8-2
OPW Departments

<table>
<thead>
<tr>
<th>Department</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Engineering</td>
<td>Engineering provides capital planning, survey, design, construction and inspection services, plan review, Right-of-Way oversight and permitting throughout the City of Norwalk to enhance public safety and welfare.</td>
</tr>
<tr>
<td>Operations</td>
<td>Operations provides street maintenance and repair services to the citizens of Norwalk and the general public so that people and goods can move freely and safely throughout the city. Included in Operations are the following activities: Solid Waste regulation; collection and disposal; the City’s contribution to the Water Pollution Control Authority; the cost of services provided for the Board of Education; and Centralized Fleet Services.</td>
</tr>
<tr>
<td>Building Maintenance</td>
<td>The Building Maintenance Department provides maintenance services to the properties throughout Norwalk. Also included in this department is building management, which oversees the operation and maintenance of most City buildings with the exception of City schools.</td>
</tr>
<tr>
<td>Water Pollution Control Authority (WPCA)</td>
<td>The WPCA oversees the operation and maintenance of an extensive sewer system that includes 200 miles of pipeline, 22 pumping stations, and an 18 million gallon per day (MGD) advanced secondary wastewater treatment plan.</td>
</tr>
<tr>
<td>Recreation and Parks</td>
<td>The Administration Department is responsible for all activities and operations of the Department of Recreation and Parks including all City sponsored recreational activities, parks and park maintenance. The Park Maintenance Department maintains 1,215 acres of grounds and property throughout Norwalk.</td>
</tr>
</tbody>
</table>

Source: Summary from Approved Operating Budget FY 22.

More detail on each department appears in Section 8.3.

Like most municipal service functions, staffing varies by department. Exhibit 8-3 captures approved positions by department compared to peer averages. The WCPA is not included due to the mix of outsourcing among the comparators. The peer average is taken from 50 similar sized, national peers with similar services, use of outsourcing, total budget, and population (49,000 to 99,000). It is important to note that slight variations exist across the peer group on location, community profile, and service emphasis.

Exhibit 8-3
FY 22 Approved Positions by Department Compared to Peer Range

<table>
<thead>
<tr>
<th>Department</th>
<th>Positions</th>
<th>Peer Range</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recreation and Parks</td>
<td>27</td>
<td>24-32</td>
</tr>
<tr>
<td>Engineering</td>
<td>15</td>
<td>12-17</td>
</tr>
<tr>
<td>Fleet*</td>
<td>10</td>
<td>8-12</td>
</tr>
<tr>
<td>Recreation &amp; Parks Grounds and Facilities**</td>
<td>20</td>
<td>21-24</td>
</tr>
<tr>
<td>Operations*</td>
<td>68</td>
<td>63-74</td>
</tr>
</tbody>
</table>

* A total of 68 employees work in the Operations Department which includes the 10 that are shown above under Fleet

** Recreation and Parks includes 27 positions with three administration positions, four recreation positions, and 30 grounds and facilities positions.

Sources: FY 22 Approved Budget and Evergreen peer benchmarks, 2021.
The results of this comparison signify that overall OPW falls within the expected range of staff based on services offered. Although this provides a high-level indication of appropriateness of staffing, more information should be considered when making staffing recommendations. These factors include customer expectations, processes, and service needs. As the Recreation and Parks department considers its future level of desired service, it is important that the anticipated standard for grounds maintenance and landscaping as well as the quality and breadth of recreation programs be considered as determinants of appropriate staffing. The current level of staffing provides for basic standards and offerings.

FINDING

The breadth of work and span of control of the Chief of OPW surpasses the typical role of directors of public works or infrastructure services. Specifically, with the inclusion of Recreation and Parks, the breadth of the Chief of OPW responsibilities spans more than what is typically categorized as public works. While interviews with leadership supports the synergy between the Operations and Recreation and Parks Departments in maintaining public property, the current title does not correspond with best practices in executive position titling.

An executive’s job title should be easily comprehended and possess the following characteristics:

- describe the services overseen;
- define the location in the organization;
- specify the primary role and responsibilities; and
- indicate the team.

The use of ‘chief’ specifies the rank and primary role in the organization as a multi-functional leader. While ‘Operations’ provides a general term to capture a variety of functions, it is overshadowed by the addition of ‘Public Works.’ In other words, by including ‘Public Works’ in the title, it relegates the entire role or position to the commonly defined element and the associated services. Moreover, the absence of the use of this title in most communities further creates internal and community confusion on the nature of the roles, responsibilities, and emphasis.

RECOMMENDATION

Recommendation 8-1:

Rename OPW to Operations and Chief of OPW to Chief Operating Officer.

By removing the public works from the division and executive title, the City is communicating the multi-faceted nature of the work performed. Changes can be made temporarily to reference this change. However, charter revisions may be needed to permanently change references to this department and position.

FISCAL IMPACT

This recommendation can be implemented with existing resources.
FINDING

The complexity and diversity of work combined in OPW as well as an independent history creates issues with identity and roles. These issues manifest themselves most in resource sharing, communication exchanges, and collaborative planning. Put simply, joining complementary resources together does not ensure realization of operational efficiencies and overall effectiveness. In most cases, resource coordination takes considerable planning and time. Furthermore, the limitation of resources creates an inherent resource competition across complementary areas. In essence, when multiple teams share roles to accomplish specific services, leadership must regularly prioritize resources and outcomes to meet multiple needs and balance expectations.

The City possesses a number of services that require strong coordination and resources sharing within OPW as well as across multiple departments, including, but not limited to tree management, capital project management, and new and re-development and City initiatives.

RECOMMENDATION

Recommendation 8-2:

Clarify roles and responsibilities of each service area to ensure accountability and facilitate prioritization.

When organizationally integrating resources in order to maximize efficiency and effectiveness, it is important to communicate roles and responsibilities clearly and concisely as assumptions and priorities change. A simple method of documenting roles and responsibilities arises from matrix diagramming.

Exhibit 8-4 provides a simple example of documenting the overlap in staff utilization by service area and director. In addition, once creating assignments for OPW, other support departments should be identified and included in the matrix.

Before beginning the development process, OPW should assemble the following:

- major services;
- major stakeholders;
- assigned resources; and
- current and future needs.
Exhibit 8-4
Example of Matrix Diagramming

Source: Created by Evergreen Solutions, 2021.
As an example, capital projects completed by Water Pollution Control Authority (WPCA) involves a variety of stakeholders, including their staff, Engineering Department staff, and outside vendors. When analyzing the various roles and responsibilities of engineering staff there is interaction before the project, during the permitting process, during the construction process, and after construction completion. Documenting the roles and responsibilities not only sets expectations, but also ensure comprehensive of complex projects and processes.

FISCAL IMPACT

This recommendation can be implemented with existing staff and resources.

FINDING

The nature of public works assignments necessitates simultaneously addressing short- and long-term needs to optimize resources. While good communication exists across OPW departments and responses are developed collectively, leveraging currently collected data would increase efficiency and effectiveness, especially when incorporating multiple teams on short- and long-term assignments. Currently, OPW utilizes Cityworks to document, report, and analyze workload as well as outcomes.

In order to fully realize the benefits of data-driven decision-making, a municipality should leverage the following:

- document major factors in determining the types and amounts of work needed;
- track the number and type of maintenance features (physical assets), and the condition of these features;
- analyze the kinds and amounts of work planned, the productivity of the work force, and the costs of the planned work;
- link the future needs to annual work planning and budget;
- summarize an annual work calendar should be prepared showing the monthly distribution of planned maintenance activities;
- align annual work with resources (labor and equipment) and set goals for short-and long-term needs; and
- prepare annual, seasonal, and short-term schedules to coincide with customer needs and resource availability.

In addition, the data and outcomes should link to the municipality’s Geographic Information Systems (GIS) to facilitate tracking, reporting, and spatial analysis.
RECOMMENDATION

Recommendation 8-3:

Leverage Cityworks data to determine and communicate an optimal allocation of resources to match short- and long-term public needs.

Based on need determination drawn from Cityworks data, OPW should establish, identify, and communicate short- and long-term priorities and team assignments to enhance customer satisfaction and resource allocation.

FISCAL IMPACT

This recommendation can be implemented with existing staff and resources.

FINDING

The long-term success of the City’s tree initiative requires the development of a comprehensive plan for placement, maintenance, and management of trees as well as the associated resources.

Tree cover benefits communities by enhancing beauty, reducing heat, improving air quality, mitigating stormwater, and increasing property value. Moreover, a number of studies have demonstrated a correlation between the presence of trees and people's mental and physical health.

Based on research conducted by University of Wisconsin – Stevens Point in 2017 with more than 600 local governments, similar size cities involve approximately 2.8 departments in tree management. Moreover, the average level of cooperation between departments slightly exceeds three on a scale of five. Similarly, the alignment of goals and objectives between departments reaches 3.5 on a scale of five. Both indicators point to the propensity for challenges when multiple departments provide tree management services. It is interesting to note that approximately 93 percent of similar size cities use contractors and 71 percent have some volunteer involvement to assist with tree management.

Like many municipalities, the City involves multiple departments in tree management, thus creating opportunities for misalignment and resource competition. The Tree Warden resides in the Operations Department, tree maintenance is shared, and other major stakeholders influencing tree placement are in Engineering and TMP. Among those municipalities with multiple departmental involvement in tree management, the presence of a service or management plan increases the chance of operational efficiency and effectiveness.

RECOMMENDATION

Recommendation 8-4:

Develop a comprehensive tree management plan involving all major stakeholders for managing the City’s tree initiative.
Based on the City’s commitment to its tree initiative, a comprehensive tree plan should be developed. A typical example is available from University of Massachusetts at https://www.umass.edu/urbantree/mgtplanguage.pdf.

**FISCAL IMPACT**

This recommendation can be implemented with existing staff and resources.

### 8.2 **STRATEGY**

The OPW operates without a comprehensive tactical plan to govern goal identification and resource allocation. Some elements typically included in a plan are present. The Departments of Public Works and Recreation and Parks possess mission statements:

*The mission statement for the Department of Public Works is to provide the safest and most effective operation for the City of Norwalk by delivering the most efficient maintenance, repair and capital improvement of city infrastructure in the best courteous, professional and citizen-responsive manner.*

*Recreation and Parks facilitates leisure experiences for the residents of Norwalk by operating and maintaining a system of parks, open spaces and community facilities; preserving and protecting the City’s natural resources; promoting the arts in Norwalk and offering a wide variety of leisure opportunities that enhance physical, intellectual, social and cultural growth and development and ensuring they are accessible to all.*

In addition, some goals appear in the City’s annual (2020-21) budget book.

- Evaluate and implement City wide sanitation collection.
- Enhance and implement public education and outreach efforts for recycling programs.
- Continue a safety program that strives for zero accidents/incidents/injuries, meets OSHA requirements and reduces risk management costs.
- Continue a pavement management program intended to steadily increase the average condition and extend the useful life of streets throughout the City.
- Continue to improve and broaden the scope of Storm Sewer, curb and sidewalk repairs (including ADA compliance) on City streets proposed for paving (Drainage, Pavement and Sidewalk Repair Budgets).
- Expand a database of problematic areas and define a scientific approach for prioritizing, forecasting, and budgeting solutions to them.
- Inclusion of two (2) plug-in Hybrid Vehicles (PHEV's) and ten (10) Hybrid Vehicles into DPW Fleet. This will enhance fleet operations and incorporate sustainability initiatives.
- Implement a pool car electronic valet system to continually rotate fleet vehicles and reduce annual maintenance costs.
• This initiative will improve fleet availability and overall reliability.

• Continue to implement a department philosophy of transparency, respect, effectiveness, accountability and team-oriented culture.

• Continue to ensure public safety and welfare.

• Continue the rehabilitation of obsolete bridge structures under the Federal Local Bridge Program (e.g., West Cedar Street Bridge).

• Streamline permits and plan review applications.

• Continue to develop and implement a holistic storm sewer improvements plan to mitigate flooding throughout the City.

• Continue to provide a variety of professional services for the City (analysis, design and permit applications to regulatory agencies, including Conservation, Army Corps, DEEP, etc.).

• Continue maintenance of watercourses (i.e., sediment removal) and drainage infrastructure (i.e., pipe cleaning).

• Complete construction of the East Wall Street - Landmark Square Safety, Accessibility, and Streetscape Improvement

• Project with the $1.5 Million LOTCIP Grant.

• Complete construction of the Bonnybrook Road over Holy Ghost Fathers Brook and Cannon Street over Betts Pond Brook bridge rehabilitation projects based upon the results of the previous inspection and evaluation of the 26 City-Owned Bridges 20 Feet or Less in Length.

• Continue to provide engineering support to different departments and agencies: Transportation, Mobility and Parking (TMP), Recreation and Parks, Redevelopment Agency, and Planning and Zoning.

• Continue to provide coordination and oversight of State of Connecticut Department of Transportation (CT D.O.T.) projects (including the Walk Bridge Program) to ensure conformance to City of Norwalk design and construction standards and specifications.

• Maintain certification as a Tree City USA.

• Continue to consider Green Infrastructure as a tool for potential design solutions.

• Continue to provide staff and technical support to various Common Council Committees and Authorities/Commission.
**FINDING**

While these are beneficial elements to managing operations, identifying priorities, and monitoring progress, it does not possess all of the value of a comprehensive tactical plan. A tactical plan defines work unit goals and identifies the actions and steps to achieve those goals. A comprehensive tactical plan benefits a department or work unit by:

- aligning staff around a shared purpose;
- setting key objectives to facilitate desired change that aligns with the organization’s strategic plan;
- defining short-term goals as well as well as supporting goals;
- assessing the current situation and the associated opportunities and threats;
- adopting more integrated approaches to managing successful change at the sub-departmental levels; and
- increasing employee motivation and engagement by increasing alignment between daily tasks and overall departmental or organizational goals and objectives.

In order to maximize effectiveness, the resources identified in the tactical plans should link to the associated budget request. A simplified approach appears in [Exhibit 8-5](#).

### Exhibit 8-5
**Approach to Linking Strategic Plan, Tactical Plans, and Budgets**

<table>
<thead>
<tr>
<th>Strategic Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Define key objectives</td>
</tr>
<tr>
<td>• Identify strategies and impact</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Tactical Plan</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Document current situation</td>
</tr>
<tr>
<td>• Assess needs and risks</td>
</tr>
<tr>
<td>• Develop tactics</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Prioritize outcomes</td>
</tr>
<tr>
<td>• Link resources to outcomes</td>
</tr>
</tbody>
</table>

*Source: Created by Evergreen Solutions, 2021.*
RECOMMENDATION

Recommendation 8-5:

Develop a Tactical Plan for OPW to set goals, prioritize projects, identify resources, and ensure successful implementation and align with the budget request.

Given the diversity of functions included in OPW, it will be important that all major groups participate in the development and implementation of the OPW Tactical Plan.

FISCAL IMPACT

This recommendation can be implemented with existing staff and resources.

8.3 ENGINEERING DEPARTMENT

Engineering provides capital planning, survey, design, construction and inspection services, plan review, Right-of-Way oversight and permitting throughout the City of Norwalk to enhance public safety and welfare. contract administration and oversight for various City departments:

- engineering and land surveying for various City departments;
- maintenance of infrastructure;
- infrastructure records and GIS mapping;
- technical support for internal City departments, including oversight of major capital projects; administration (design, bidding, and construction) of $16-$18 million of annual engineering capital improvement projects;
- City Right-of-Way oversight and permit administration; and
- Liaison for State (e.g., ConnDOT) and federal capital projects

Engineering provides a wide array of services. A brief synopsis of some key outcome metrics relating to annually recurring projects appears in Exhibit 8-6. When comparing 2020 and estimated values for 2021, service demand or outcomes decreased by a small increment in each area except permit review and drainage.
Exhibit 8-6
Summary of Key Engineering Outcome Metrics
2020 and 2021

<table>
<thead>
<tr>
<th>Outcome</th>
<th>2020</th>
<th>2021 (est)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Permits</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Encroachment Permits Issued</td>
<td>447</td>
<td>470</td>
</tr>
<tr>
<td>Driveway Permits Issued</td>
<td>118</td>
<td>170</td>
</tr>
<tr>
<td>Total Permits</td>
<td>565</td>
<td>640</td>
</tr>
<tr>
<td><strong>Plan Reviews</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Reviews</td>
<td>57</td>
<td>47</td>
</tr>
<tr>
<td><strong>Concrete Sidewalks</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Linear Feet (LF)</td>
<td>12,751</td>
<td>11,876</td>
</tr>
<tr>
<td>Total Miles</td>
<td>2.41</td>
<td>2.249</td>
</tr>
<tr>
<td><strong>Paving</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of Roads</td>
<td>42</td>
<td>31</td>
</tr>
<tr>
<td>Linear Feet Paved</td>
<td>53,465</td>
<td>41,327</td>
</tr>
<tr>
<td>Center Lane Miles Paved</td>
<td>10.13</td>
<td>7.83</td>
</tr>
<tr>
<td>Total Tonnage</td>
<td>20,561</td>
<td>14,683</td>
</tr>
<tr>
<td><strong>Drainage</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Roads for On-Call</td>
<td>5</td>
<td>10</td>
</tr>
<tr>
<td>Estimated Cost</td>
<td>$302,997</td>
<td>$551,765</td>
</tr>
</tbody>
</table>


The current organizational structure for Engineering is shown in Exhibit 8-7.

Exhibit 8-7
Engineering Organizational Chart

Source: Evergreen Solutions, 2022.
COMMENDATION

Engineering provides comprehensive services to the City and serves as a resource to most departments.

Engineering is a vital function that acts as a support mechanism for most City Departments. As a partner in City capital projects, Engineering’s staff provide expert advice as well as technical support on a variety of projects at each project phase. In addition, Engineering provides support for most short- and long-term economic development initiatives. Engineering should be commended for its breadth of services and consistent commitment to customer service.

FINDING

The City has experienced a rise demand for permit inspections during the COVID-19 period. As part of the permit issuance process, Engineering assigns Permit Inspectors the responsibility to review the job. In most cases, customer satisfaction directly correlates with the efficiency and specifically the timeliness of completing inspections.

Exhibit 8-8 captures the increase in permits between 2020 and 2021. Based on current estimates for 2021, 75 more permits were issued than in the previous year. Furthermore, this is part of an overall national trend.

Exhibit 8-8
Permits Issued by Category
2020 and 2021

Exhibit 8-9 illustrates the changes nationwide during the last several years. As expected, many communities have experienced growth in demand for inspections. However, with potential economic changes in 2022, demand stands to return to the base trendline.
RECOMMENDATION

Recommendation 8-6:

Monitor permit workload in 2022 to determine if an additional part-time Permit Inspector is required.

While demand for permit inspections increased in the 2020 and 2021 periods, the upswing is expected to normalize in 2022. If the City is going to increase capacity in inspections, the additional resource should be aligned with an on-going need.

FISCAL IMPACT

This recommendation can be implemented with existing staff and resources.

8.4 OPERATIONS DEPARTMENT

The Operations Department possesses a broad set of expertise and responsibilities that the community relies on for mobility, sanitation, and safety. The primary services encompass most of a traditional Public Works offerings. They include:

- road maintenance;
- fleet services;
- recycling programs;
- solid waste programs;
- wastewater programs;
- storm water programs;
- snow removal;
- leaf collection;
- street lighting; and
- tree maintenance and removal.

The current Operations Department organizational chart is shown in **Exhibit 8-10**.

**Exhibit 8-10**

**Operations Organizational Chart**

Source: Created by Evergreen Solutions, 2022.

**FINDING**

Maintaining Operations as the department title creates redundancy with the proposed division name in **Recommendation 8-1** of Operations Division. The primary services provided by the Operations Department encompass most of a traditional Public Works offering, as shown in the introduction.
RECOMMENDATION

Recommendation 8-7:

Change the name of the Operations Division to the Public Works Department.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

8.5 NORWALK WATER POLLUTION CONTROL AUTHORITY (WPCA)

The Norwalk Water Pollution Control Authority (WPCA) oversees the operation and maintenance of an extensive sewer system that includes 200 miles of pipeline, 22 pumping stations, and an 18 million gallon per day (MGD) advanced secondary wastewater treatment plant. The major services include wastewater systems as well as collection, pumping, and treatment systems. The WPCA currently employs three full-time staff members and a contracted operational staff (Suez Environmental Services) with an operating budget of approximately $18,999,648 for FY 22 and a capital budget of $2,000,000 for FY 22.

The WPCA organizational chart appears in Exhibit 8-11.

Exhibit 8-11
WPCA Organizational Chart

Source: Created by Evergreen Solutions, 2022.
FINDING

WPCA possesses a strong commitment to leveraging tactical planning as well as operational tools to manage operations and predict future resource needs. Some of the major tactical documents guiding operations and management include:

- WPCA Departmental Strategic Plan, FY 17 to FY 22;
- Sewer Rate Structure Evaluation and Consumption-Based Billing Study;
- Consumption-Based Billing Study Report Update;
- WWTP Facility Plan;
- Pump Stations Asset Management Plan; and
- Collection System Master Plan.

This combination of documents provides not only guidance, but also establishes short- and long-term goals.

Wastewater management has undergone significant technological change in the last several decades and the City has adopted a number of innovations on its own as well as through its contract with Suez Environmental Services to support its operations. Some of the major innovations associated with the 2020 Suez Environmental Services contract include:

- Collection System equipment: CCTV Truck, Jet/Vactor Truck, and Pole camera;
- Technology: SL Rat, Smart Covers, and IT Pipes;
- GIS Data: Positioning and mapping;
- Sewer Maintenance: cleaning and CCTV inspection and PACP scoring monthly requirements; and
- Industrial Pretreatment Program: SUEZ sampling and testing and reporting (~475 locations annually).

Exhibits 8-12 and 8-13 illustrate sample reports generated by smart covers and Sewer Line Rapid Assessment Tool (SL RAT) tools, respectively. The smart cover tool collects and reports the level of wastewater under manholes reducing the need for staff to verify levels and aggregate usage data.

SL RAT tools use a transmitter and receiver to send an acoustic signal between two fixed points along a pipeline to ascertain the level of blockage. The data identify areas for focus and potential resource needs.
Exhibit 8-12
Smart Covers Report Example

Exhibit 8-13
Example SL RAT Pipe Analysis

COMMENDATION

The WPCA is utilizing tactical planning and innovations in managing operations and predicting future resource needs as a tool for to providing efficient and effective services.

8.6 FACILITIES DEPARTMENT

The Facilities Department is responsible for facilities and building management for an inventory of 76 locations with an average of 46 years and an estimated square footage of over 4 million and value of over $832 million. Currently, as shown in Exhibit 8-14, the City uses a Building and Facilities Coordinator and an outsourcing contract with Guardian Services to provide facilities services. In addition, this Department provides technical support related to all phases of facility planning, design, construction, and maintenance and serves as project manager for related construction projects.

Exhibit 8-14
Facilities Department Organizational Chart

FINDING

There is no succession plan in place for the Building and Facilities Coordinator position, which places the City at risk should the incumbent leave. In the simplest sense, succession planning equates to planning for and executing a smooth transition of leadership positions.

Given the reliance on outsourcing, extensive experience and contacts, and the likelihood of retirement of the current manager in the next two to three years, the City needs to prepare for the future transition in leadership.

When preparing to transition a senior team member in an area of specific expertise and little staffing redundancy, it is important to:

- develop a plan for transition;
- cultivate a talent pipeline (internal or external);
• invest in internal development and external relationship development; and
• monitor progress.

RECOMMENDATION

Recommendation 8-8:

Develop a succession plan for the Building and Facilities Coordinator position to ensure continuity of services.

The long tenure and extensive expertise, as well as relationships within and outside of the City of the current Manager, necessitates developing a replacement during the tenure of the current Manager. As the primary subject matter expert on not only maintenance issues, but also construction, the selected candidates must possess an equally broad set of capabilities.

It is important to note that this recruitment and selection of this position will take time given the expertise needed and it is in the City’s interest to have overlap between the current incumbent and potential successor. Exhibit 8-15 summarizes some of the general competencies that tend to increase success of leaders in a similar role in municipalities.

Exhibit 8-15
Superintendent-level Employee Key Competencies

| Planning and Organizing Work | • Ability to develop plans to accomplish work operations, objectives, goals and policies.  
|                            | • Ability to arrange and assign work to best use manpower and resources. |
| Program Management          | • Ability to coordinate and administer programs, activities, and protocols.  
|                            | • Ability to manage resources, monitor activities, and assess environmental risks and quality control associated with the program.  
|                            | • Ability to observe and assess work and provide meaningful feedback |
| Safety and Health Management| • Ability to establish a culture of safety for employees and ensure that work processes are free from safety and health hazards, that employees are properly trained, and programs are in place to ensure safety. |
| Strategic Planning          | • Ability to develop, measure and evaluate organizational structures and processes to fulfill organizational goals and strategic plans, using best practices. Ability to identify opportunities, develop and implement solutions, and measure impact. |
| Business Administration    | • Knowledge of appropriate business practices and procedures.  
|                            | • Manage and improve business processes and operations by ensuring continuity, integration of policies and procedures with the organization’s mission and strategic plan.  
|                            | • Ability to establish work guidelines and set the appropriate levels of quality and quantity of work. |
| Human Resources Management | • Ability to recruit, select, develop, counsel, discipline, and evaluate performance of employees to retain a diverse workforce; ability to administer and ensure compliance with human resources policies and procedures.  
|                            | • Ability to observe and assess work; ability to provide feedback; may require ability to provide technical supervision; ability to develop knowledge, skills, and abilities of employees; ability to plan for and support employees in career development opportunities. |
| Career and/or Talent Development | • Ability to provide employees with the knowledge, skills and abilities to accomplish work and provide career development opportunities. |


FISCAL IMPACT

This recommendation can be implemented with existing staff and resources.
8.7 RECREATION AND PARKS DEPARTMENT

Public spaces and facilities not only provide a location to interact with others or participate in some type of community event, but provides the basis for community resilience. A few of the ways that parks enhance a community include the following:

- contributes to the quality life;
- supports physical and mental health;
- creates opportunities to exposure to intellectual, cultural, and physical activities;
- formulates pride and a sense of ownership in the community;
- increases constructive interaction, equity, and prosperity in a community;
- assists with reducing crime; and
- increases the attractiveness of a community.

The Recreation and Parks Department provides recreational programming and public property and park maintenance. In regard to public property, the Department is responsible for maintaining all park lands, including any land or facilities within 25 feet of a main school building, sports fields, field houses, and concessions.

Recreation programming includes the following sports or activities for youth and adults:

- volleyball;
- baseball;
- softball;
- flag football;
- soccer;
- basketball; and
- bocce.

Moreover, Parks played an important role for people seeking respite from the toll of social isolation during the pandemic.

Exhibit 8-16 summarizes the organizational structure of the Recreation and Parks Department.
FINDING

The Recreation and Parks Department possesses a solid strategic as well as tactical approach to growth and operations. In the coming year, the Department will pursue the following goals:

- initiate a Parks Department Master Plan update;
- increase the Department’s awareness and marketability;
- update the Department’s Policy and Procedures and adopt industry best practices;
- adopt and utilize the Cityworks system to record and track public park service requests;
- continue to ensure playground safety through the implementation of a Certified CPSI inspection program; and
- develop a program partnership process and contract template which meets the department’s mission and objectives.

The Department’s strategic initiatives will help take the current operation from providing minimal services to being a leader among similar sized municipalities. The Parks Master Plan, with its significant public participation, should be completed during 2022 and serve as the basis for developing a departmental strategic plan in 2023. In addition, the Department will pursue accreditation.
COMMENDATION

The Recreation and Parks Department is using tactical planning and sound operational practices to enhance its offerings, while providing efficient and effective services to the City of Norwalk.

FINDING

The City Recreation and Parks Department offers comprehensive programming and maintenance services in a more efficient manner than its peers based on average cost per resident. Exhibit 8-17 compares the average cost per resident for six local municipalities. While park acreage and facilities, services offered, and in some cases assignment of duties may differ, the Department possesses a broad range of responsibilities and services close to the average of acreage, yet provides services for only slightly above the average cost per resident of its peers. It is important to note that while the Department operates very efficiently from a cost standpoint, it does not possess a comprehensive team typically found in high performing park systems. For example, the Department does not include horticultural or natural resources professionals.

Exhibit 8-17
Comparison of Average Cost of Recreation and Parks by Resident

The 2020 National Parks and Recreation Association survey found that among jurisdictions with 50,000 to 99,000 in population, the median expenditure per resident equaled $88.53 with a range of $52.91 to $156.90. Finally, when comparing to the highest cost municipalities, the City is considerably lower than those that exceed $165.86 per resident. As mentioned above, one of the main factors leading to lower cost of service delivery is the focus on basic grounds maintenance instead of utilizing more grounds professionals in horticulture and natural resource management.

COMMENDATION

The Recreation and Parks Department’s Recreation program services are being provided in a cost-effective manner; and the Parks and facility maintenance staff work in a highly efficient manner when compared to the amount of demand, and resources available to them to meet the demand.
CHAPTER 9: INFORMATION TECHNOLOGY
9.0 INFORMATION TECHNOLOGY

Today, technology is at the heart of every aspect of successful operations. Technology defines an organization’s current capability as well as its future potential to deliver high quality services, minimize staffing resources, and align services with customer expectations.

The remainder of this chapter addresses the three key factors most responsible for successfully meeting technology expectations for internal and external customers:

9.1 Organization and Management
9.2 Strategy
9.3 Operations

9.1 ORGANIZATION AND MANAGEMENT

Ideally, technology supports all major internal and external customer needs while enabling employees to conduct business in a way that maximizes resource utilization. Organizing technology resources to effectively achieve this outcome can be challenging, but is necessary for operational success. Not only does it require the necessary staffing level, but also the necessary skills, tools, and leadership.

More specifically, through its technology resources, an organization improves the following characteristics:

- efficient resource allocation – In order to achieve its strategic goals, organizations must ensure that its resources are allocated properly and assets are assigned and managed in alignment with its business objectives;

- enhanced business decisions – technology provides the data necessary to make decisions quickly and accurately in order to achieve success;

- meeting customer needs – technology is essential to communicate with customers to assess customer needs and devise solutions in real time;

- improved productivity – technology provides tools that can enhance productivity and improve organizational success;

- relevant technical resources – appropriate technology improves products, processes, and services to ensure productivity;

- reduced operational cost – adopting technology equates to less manual work and the associated costs as automation grows; and

- increased mobile accessibility – technology increases locational accessibility and flexibility.
For local governments, technology once held the position of being something desirable, but not critical to operations. Today, citizens assume, if not demand that appropriate technology is readily available in all facets of public operations to provide key information, facilitate issue resolution, and enhance community interaction.

While most local governments embrace technology, meeting technological expectations presents a number of challenges:

- **continuous technology changes** – technology innovations change on a rapid cycle leaving the public sector behind the private sector in many cases due to a lack of readily available financial resources as well as staff expertise;

- **rising citizen expectations** – with the proliferation of convenient and cost-effective technology solutions in most facets of daily life, citizens expect the same level of accessibility, ease of use, and service quality as what consumer companies provide for ordering food, calling a ride, and accessing entertainment;

- **impact of diverse, disconnected, and antiquated systems** – older and disconnected systems compound challenges for integrating data; and

- **user-friendly access to meet multiple capabilities and needs** – the diversity of citizen needs and technical capabilities necessitate those platforms adjust and align with different groups and levels of access.

In order to address internal and external demand for services in an environment of the above challenges, the City operates a small technology department. The Department of Information Technology (IT) strives to accomplish the following:

- deliver high quality, effective, reliable, sustainable and secure information systems;

- provide effective and efficient technical services and support to City departments and staff;

- develop and promote consistent technical standards;

- foster innovation and leadership in e-government in support of citizens, staff, visitors, businesses, and other government agencies; and

- provide continual improvements to operations.

As shown in **Exhibit 9-1**, IT includes four key work units or teams.
Among the filled positions in Exhibit 9-1, the major duties by classification include the following:

- **IT Director** – manages the day-to-day operations of the department, participates in City technology discussions, supports IT procurement, and develops custom applications.

- **E-Government Coordinator** – manages the City’s website, coordinates audio-visual services, administers MUNIS, supports Police, Fire, OPW on technology issues, administers public access channel.

- **Database Administrator/Programmer** – manage and maintain databases, develop applications, manage applications, conduct data analysis, and manage third party contracts.

- **Senior Network Engineer** – manages network, maintains telecommunication devices, maintain data centers, manage cybersecurity, maintain Wi-Fi infrastructure, maintain locational systems.
• **Junior Network Engineer** – helps plan, build, install, and troubleshoot networks or technology systems. Works under the supervision of the Senior Network Engineer.

• **Senior Systems Engineer** (3) – maintains City servers and associated applications, manage third party support contracts, ensure cybersecurity, supports department-specific systems, support help desk staff.

• **Desktop Support Technician (2)/Desktop Support Assistant (1)** – support end users, troubleshoot major issues, conducting on-boarding training, support specific department needs, installs and inventory of hardware, assist system engineer.

While the current structure combines staff by functional competencies, the size of the department and level of customer needs necessitate cooperation and collaboration. Several current examples include:

• system administrator staff providing support to desktop support;
• desktop support providing task assistance to system administration;
• IT Director assisting with application development; and
• network management and system administration collaborating on cybersecurity.

**FINDING**

One of the greatest challenges to improving the City’s efficiency is the current state of its technology resources.

The current placement of IT within the Finance Department fails to identify technology as a key enabling partner for the City’s success. Currently, the IT Director reports directly to the Chief Financial Officer (CFO). While this reporting structure works well for smaller municipal organizations, more complex operations and commitment to innovation necessitates a higher organizational placement of the Department’s leadership.

The primary reasons for elevation of IT leadership to report to the senior executive and take on a chief level role includes the following:

• technology is a key enabler and value driver for individual departments as well as the organization as a whole;

• technology contributes a significant cost element to the overall budget;

• technology initiatives, when successful, reduce process and service costs;

• desired service delivery models require regular technology innovation; and

• technology increases the quality of candidates available for leading operations.
In most cases, a municipality of the size and complexity of the City possesses a Chief Information Officer (CIO) to guide the technological transformation of the municipality. Some common differences between a CIO and IT Director appear in Exhibit 9-2.

**Exhibit 9-2**

**Common Differences Between IT Director and CIO**

<table>
<thead>
<tr>
<th>Title</th>
<th>Role</th>
</tr>
</thead>
</table>
| IT Director | • Oversees the daily tasks and operations, including support services, staff management, IT asset lifecycle management, and project management  
  • Maintains adherence to standard operating procedures (SOPs) and support processes  
  • Ensures maintenance and operations of technology systems  
  • Advises department on technology purchases. |
| CIO      | • Responsible for the strategic technology planning for the organization to increase automation, improve data security and control, and monitoring pertinent industry technology trends.  
  • Develops and improves strategic planning, process, and procedure related to the organization’s technology  
  • Participates in new technology initiatives and evaluates their impact  
  • Develops the technology budget for organization as well as the information technology department. |

Source: Created by Evergreen Solutions, research, 2022.

The current IT Director performs a multitude of roles, many of which focus on the operational responsibilities of vacant staff positions. Given the City’s size, complexity of needs, and potential for automation, a CIO-level position is necessary to guide citywide strategy, lead system and data integration, and ensure modernization of processes and outcomes.

**RECOMMENDATION**

Recommendation 9-1:

Create a CIO position that reports to the Mayor and oversees all technology planning and operations for the City.

The City should recruit and hire a qualified CIO and realign IT to report to the Mayor’s Office. The CIO should serve in the following capacity:

- providing an innovative vision and leadership for developing and implementing information technology initiatives and strategies in alignment with the mission of the organization;

- collaborating with the integration of technology in the provision of City services with the Mayor, Common Council, City Management, department leaders and front-line personnel in alignment with business objectives;

- directing and managing city-wide information technology/systems and telecommunication activities;
overseeing the work and operations of the City’s IT; and

serving as a member of the City’s Management Team, working collaboratively with City Management and other department leaders on strategies and policies to accomplish the City’s mission, strategic plan and other Common Council priorities.

It is imperative that the CIO not only advises and supports City departments, but also serves as an approving party for technology selection and implementation to ensure alignment with the organizational strategy, resource sustainability, and continuity of service. As part of these efforts, departmentally-requested technology projects will need to be tiered or prioritized.

In order to recruit the best candidate possible, the City should seek a person with these minimum qualifications:

- Master’s degree in Business Administration, Computer Science, or Information Technology; and

- at least ten years of experience in administration of information systems and technology, with increasing level of responsibility throughout.

FISCAL IMPACT

Based on the Pay Plan for Non-Union, Appointed, and Elected Officials, this position should be paid at the midpoint of the director range ($118,886 to $162,687) or $140,786 with benefits cost of 69.89 percent for total compensation of $239,181.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Create a CIO Position</td>
<td>($239,181)</td>
<td>($239,181)</td>
<td>($239,181)</td>
<td>($239,181)</td>
<td>($239,181)</td>
</tr>
</tbody>
</table>

FINDING

While IT’s sub-functional division of duties aligns well with current operations, the Department lacks comprehensiveness and depth of services. This combination of limitations results in the following operational challenges:

- absence of management between the director and staff due to the vacancy in the Applications Manager position;

- overreliance on staff to cover areas with less specialized skills and experience; and

- lack of sufficient differentiation in core functional duties to scale with service demand.

Exhibit 9-1 summarizes the current organizational structure and the ten filled positions. In addition to the three listed vacancies, the City has identified the need for a Chief Information Security Officer.
When comparing IT outcomes to peer benchmarks, the strain on current resources becomes even more evident. **Exhibit 9-3** captures some basic outcome metrics for similar-sized public and private organizations. In the current budget, the City expends less than a percentage point of total expenditures on technology compared to an average of four percent. Similarly, the City allocates about a third of the dollars allocated by peers for IT expenditures per employee. As a result, City staff serve almost three times more users than in peer organizations. Finally, when examining support requests only, the City falls at the benchmark on requests per month per employee and slightly below users per IT support technician.

**Exhibit 9-3**  
**Summary of IT Benchmark Data**

<table>
<thead>
<tr>
<th>Measure</th>
<th>City</th>
<th>Peer Benchmark</th>
</tr>
</thead>
<tbody>
<tr>
<td>IT Cost/Total Expense</td>
<td>0.67%</td>
<td>4.00%</td>
</tr>
<tr>
<td>IT Expense per Employee</td>
<td>$3,111.74</td>
<td>$9,600.00</td>
</tr>
<tr>
<td>IT Staffing Ratio</td>
<td>85</td>
<td>32</td>
</tr>
<tr>
<td>Support Tickets Opened Per Employee (month)</td>
<td>109.44</td>
<td>108</td>
</tr>
<tr>
<td>User per IT Support Staff</td>
<td>212.50</td>
<td>238</td>
</tr>
</tbody>
</table>

*Source: Created by Evergreen, 2022.*

These results point to several observations:

- technology support is primary focus of a large portion of current staff resources;

- low cost of technology provision indicates a less advanced level of automation and digital services as well as a status quo mentality of technology realization; and

- increasing technology capability within the City would require additional staff and financial resources.

Based on similar size, municipal peer data (50,000 to 99,000 in population), the benchmark level of staffing for the City technology function appears in **Exhibit 9-4**.

**Exhibit 9-4**  
**Estimated Staffing Levels for IT**

<table>
<thead>
<tr>
<th>Area</th>
<th>City Count by Area of Specialization</th>
<th>Peer Ratio by Area of Specialization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Management</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Program Development</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td>Network Management</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>System Administration</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td>IT Support</td>
<td>3</td>
<td>4</td>
</tr>
</tbody>
</table>

*Source: City documents and Evergreen peer data, 2021.*

Based on the average staffing within its size category, the City lacks five full-time positions typically found among its peers. It is important to note that system and application sophistication, customer needs and expectations, use of out-sourcing, and staff experience impact the required
level of IT staff. Similarly, the lack of sufficient experienced staff lead to how decisions are made on the same factors. This concern is discussed further in Section 9.2 below.

Another indicator of the gap between need and current staffing is the 563 hours of overtime from July 1, 2021 until December 1, 2021. It is important to note that these hours do not include overtime worked by staff to support Common Council or Committee meetings operating under the COVID-19 protocols. At current overtime rates the additional hours generated an additional staff cost of approximately $44,232, not including benefits.

With limited available staffing, the City has focused on maintaining current systems and infrastructure, and providing planning and development assistance when requested by City leadership. One way in which IT leverages low-cost resources is through its current IT intern program. This program brings in students from the local area to assist the IT Department during school breaks. While the availability of interns is insufficient to cover shortfalls in staffing, the interns bring up-to-date expertise that benefit current staff.

**COMMENDATION**

The IT is commended for leveraging IT interns to bring in additional support and new skills.

**RECOMMENDATION**

Recommendation 9-2:

**Fill the Senior Applications Manager and Chief Information Security Officer positions.**

The City’s 2021-22 budget includes line items for all, but the Chief Information Security Officer position. The 2020-21 budget included $150,000 for the position. According to the Public Technology Institute (PTI) 2021 City/County CIO Survey, cybersecurity and data loss prevention is most important priority in the next two years.

In 2020, the cybersecurity firm BlueVoyant published a report that disclosed state and local governments saw a 50 percent increase in cyberattacks since 2017. It is imperative that the City fills this position. While these hires will address a portion of several key areas of operational need, most of the database management and development needs will remain. Once determining the future technology needs of the City and how best to address those needs, it is very likely more staff will be needed.

**FISCAL IMPACT**

This recommendation will require filling the budgeted position of Senior Applications Manager and adding the Chief Information Security Officer position back to the budget. The cost was calculated based on $150,000 in base and 69.89 percent of benefits for the Chief Information Security Officer positions. Potentially, some overtime could be reduced when the positions of Sr Applications Manager is filled. Based on overtime usage in 7/2021 to 6/2022 period, the City could potentially save $12,500 in overtime on an annual basis bringing the total cost for adding this position to $242,335 ($254,835 minus $12,500).
<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fill the Senior Applications Manager and Chief Information Security Officer Positions</td>
<td>($242,335)</td>
<td>($242,335)</td>
<td>($242,335)</td>
<td>($242,335)</td>
<td>($242,335)</td>
</tr>
</tbody>
</table>

**FINDING**

While IT employed several incumbents in the GIS Analyst role in the past, the level of competition for this skillset, different skills needed, as well internal demand for meeting spatial documentation and analysis needs point to procuring GIS services to a well-qualified vendor.

As cited by John O’Looney in his research on public application for GIS more than 20 years ago, “at least 70 to 80 percent of the average local government's work involves land or geographically related issues or tasks.” Given this preponderance for documenting, analyzing, and reporting on spatial data, GIS is a critical tool for effective local government. A few areas that a local government most commonly leverages GIS include:

- land-use planning;
- subdivision review;
- permit tracking;
- parcel/tax mapping;
- engineering design;
- road and utility maintenance;
- event (crime, fires, accidents);
- emergency management;
- infrastructure assessment and development;
- environmental management; and
- property management.

While small local governments vary in their approach to sourcing and managing GIS, the more recent trend has been to engage a third-party provider to reduce the risk of turnover and rising staff costs.

**RECOMMENDATION**

Recommendation 9-3:

Continue to utilize the internal Geographic Information System (GIS) Analyst position as well as outsource part of the GIS support role to an external vendor.

Most, if not all City departments possess GIS-related needs and would benefit from leveraging spatial data in maximizing the efficiency and effectiveness of service delivery as well as information sharing with stakeholders. By combining an internal resource that possesses
comprehensive knowledge of internal customers with a third party with extensive applications and utilization knowledge, the City can quickly customize its approach to spatial data, while only incurring the costs of expertise, when needed.

FISCAL IMPACT

The City has recently hired a GIS Analyst to fill its previous vacancy. Given the backlog of work and need for consistent and high-quality GIS services, the City should allocate at least $150,000 annually for outsourced services. Once assessing need, the City can make a determination of continuing to outsource or hire the necessary staffing.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Continue to Outsource a Portion of the GIS Workload</td>
<td>($150,000)</td>
<td>($150,000)</td>
<td>($150,000)</td>
<td>($150,000)</td>
<td>($150,000)</td>
</tr>
</tbody>
</table>

9.2 STRATEGY

IT strategy as an integral part of overall business strategy strives to align technology resources and operations with business goals. A well-conceived strategy sets goals and objectives for how to implement and maximize technologies within the framework of addressing key business objectives. The communication of the strategy increases understanding of the current state of technology, current and future needs, and how technology will change to meet future needs.

Without a strategy, IT tends to become more reactive and less of an organizational partner. As a result, a gap opens between business needs and IT capability and performance. This creates a gap between business demands and IT limiting departmental as well as organizational success.

Given the variability of comprehensiveness and alignment of IT strategy, availability of resources, complexity of demand for IT services, and level of nearly constant resource commitment, local governments have transformed from traditional, service-focused operations to strategic partners at different rates. A common way to express the degree of progression within a transformational process is by a maturity model.

Technology operations that succeed at providing support and infrastructure services on a consistent basis is the baseline for comparison. As the technology function transforms, IT builds on its commitment to accessibility and maintenance to offer greater community access and governmental transparency and improved business operations. Ideally, the technology function will reach the point of driving organizational and community change.

Exhibit 9-5 captures the basic stages and elements of the digital transformation maturity model utilized for this analysis.
Exhibit 9-5
Digital Transformation Maturity Model

<table>
<thead>
<tr>
<th>Element</th>
<th>Traditional Phase</th>
<th>Transitional Phase</th>
<th>Virtual Government Phase</th>
<th>Smart Government Phase</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automated Processes</td>
<td>Some</td>
<td>Some</td>
<td>Considerable</td>
<td>Most</td>
</tr>
<tr>
<td>Digital Documentation</td>
<td>Limited</td>
<td>Considerable</td>
<td>Most</td>
<td>Most</td>
</tr>
<tr>
<td>Electronic Relationships</td>
<td>Limited</td>
<td>Limited</td>
<td>Considerable</td>
<td>Most</td>
</tr>
<tr>
<td>Electronic Services</td>
<td>Limited</td>
<td>Limited</td>
<td>Considerable</td>
<td>Most</td>
</tr>
<tr>
<td>Innovative Technology</td>
<td>Limited</td>
<td>Some</td>
<td>Considerable</td>
<td>Considerable</td>
</tr>
<tr>
<td>Data-Driven Decision-Making</td>
<td>Limited</td>
<td>Some</td>
<td>Some</td>
<td>Considerable</td>
</tr>
<tr>
<td>Staff Competencies</td>
<td>Limited</td>
<td>Some</td>
<td>Medium</td>
<td>Considerable</td>
</tr>
</tbody>
</table>

Source: Created by Evergreen, 2021.

The major elements include the following:

- **Automated Processes** – moving labor and many times paper-intensive processes to automated solutions;
- **Digital Documentation** – recording, maintaining, and accessing records in a digital format;
- **Electronic Relationships** – interacting with governmental and community stakeholders as well as individual citizens by electronic means;
- **Electronic Services** – shifting the primary methods of service interaction to electronic means of interaction, documenting, and resolving common citizen needs;
- **Innovative Technologies** – adopting modern tools for enhanced service provision, communication, and decision-making;
- **Data-Driven Decision-Making** – leveraging data to make strong current and future decisions; and
- **Staff Competencies** – ensuring that all staff possess the necessary skills and competencies to provide efficient and effective services in a technologically advanced environment.

Although the transformation process could utilize different segmentation points, four primary phases relate to the elements presented above:

- **Traditional Phase** - encompasses those organizations principally focused on infrastructure, support, and limited levels of custom development.
- **Transitional Phase** – involves technology resources in automating some commonly utilized processes, digitizing documents, and initiating electronic services.
- **Virtual Government Phase** - transform most major services over to electronic service delivery and increases the use of innovative technology, data-driven decisions, and staff competencies.
• *Smart Government Phase* - entails the management of business processes with the help of intelligently networked information and communication technologies.

Each element is rated within a phase based on a four-point scale of limited, some, considerable, and most. Limited equates to approximately 20 percent or less of key processes, areas, or operations have undergone the associated level of transformation, while some indicates that between 20 and 40 percent have transformed. Considerable accounts for 40 to 60 percent, and most signifies more than 60 percent. While specific values are provided for each, the City does not possess sufficient planning documents or records to assign a specific value. Nevertheless, interaction with Department provided a sound basis for comparison.

According to the members of IT, as well as other departments within the City, IT operates as a maintenance and operations function primarily and is not recognized as supporting the transformation of important business processes. As a result, IT has not transformed like other municipal technology functions due to a lack of human and financial capital. Put simply, IT remains several cycles behind its leading peers on resources, technical capability, and sophistication of tools.

The one exception to this perception pertains to the number of single process software development projects. IT identified more than 55 applications that are utilized by various City departments to manage a specific process component or share public information.

A list of these applications appears in *Exhibit 9-6*. In addition, IT staff were asked to describe their current duties and responsibilities and the majority pertained to ensure efficient operation of the current infrastructure and operations. Given the current needs of the City, level of technology utilized by individual departments, and limited staff resources available in IT, the majority of emphasis is within the traditional Phase.
### Exhibit 9-6

**Applications Developed and Managed By IT**

- DPW Project Manager [https://nwlk.norwalkct.org/dpwpm](https://nwlk.norwalkct.org/dpwpm)
- Resident Pass Manager [https://nwlk.norwalkct.org/ResidentPassManagement/](https://nwlk.norwalkct.org/ResidentPassManagement/)
- Restaurant Ratings [https://nwlk.norwalkct.org/RestaurantRatings](https://nwlk.norwalkct.org/RestaurantRatings)
- Rain gauge [https://nwlk.norwalkct.org/raingauge](https://nwlk.norwalkct.org/raingauge)
- Complaints & Violations [https://nwlk.norwalkct.org/eZoning/](https://nwlk.norwalkct.org/eZoning/)
- Resident Pass Verification [https://nwlk.norwalkct.org/passes](https://nwlk.norwalkct.org/passes)
- Beach Closing Notification [https://nwlk.norwalkct.org/beachclosing](https://nwlk.norwalkct.org/beachclosing)
- IT Projects [http://cityhall/ITProjects](http://cityhall/ITProjects)
- IT Assets [http://intrasql02/ITAssets](http://intrasql02/ITAssets)
- Property Tax Bill [https://nwlk.norwalkct.org/eTaxbill/](https://nwlk.norwalkct.org/eTaxbill/)
- Sewer Bill Manager [https://nwlk.norwalkct.org/SewerBill](https://nwlk.norwalkct.org/SewerBill)
- Police Extra Works [https://nwlk.norwalkct.org/policeextraworks](https://nwlk.norwalkct.org/policeextraworks)
- Oil Tank Manager [https://nwlk.norwalkct.org/OilTank](https://nwlk.norwalkct.org/OilTank)
- NPD Front Desk [http://intrasql01/NPDFrontDesk](http://intrasql01/NPDFrontDesk)
- About My Place [https://nwlk.norwalkct.org/AboutMyPlace/](https://nwlk.norwalkct.org/AboutMyPlace/)
- Board of Assessment Appeals Schedule [https://nwlk.norwalkct.org/baa](https://nwlk.norwalkct.org/baa)
- NPD Reports [https://nwlk.norwalkct.org/nPDRport](https://nwlk.norwalkct.org/nPDRport)
- Personal Property Declaration [https://nwlk.norwalkct.org/PPD](https://nwlk.norwalkct.org/PPD)
- Property Alert Service [https://nwlk.norwalkct.org/PropertyAlert](https://nwlk.norwalkct.org/PropertyAlert)
- City of Norwalk Tax Sale [https://nwlk.norwalkct.org/sTaxSale](https://nwlk.norwalkct.org/sTaxSale)
- Board & Commissions Admin [https://nwlk.norwalkct.org/abc](https://nwlk.norwalkct.org/abc)
- Boards & Committees List [https://nwlk.norwalkct.org/eabc](https://nwlk.norwalkct.org/eabc)
- Voters Polling Place Lookup [https://nwlk.norwalkct.org/eVoter/PollingLocation.aspx](https://nwlk.norwalkct.org/eVoter/PollingLocation.aspx)
- Voting Registration Retrieve [https://nwlk.norwalkct.org/eVoter/votingreg.aspx](https://nwlk.norwalkct.org/eVoter/votingreg.aspx)
- Traffic Calming [https://nwlk.norwalkct.org/TrafficCalming](https://nwlk.norwalkct.org/TrafficCalming)
- Dashboard Manager [https://cityhall/Dashboard](https://cityhall/Dashboard)
- Payroll Management [https://cityhall/cEcomptroller](https://cityhall/cEcomptroller)
- Permit Manager [https://cityhall/cPermit](https://cityhall/cPermit)
- Sewer Tax Management [https://cityhall/eSewerTax](https://cityhall/eSewerTax)
- Parking Car Manager [https://intrasql01/eCityCarsePar](https://intrasql01/eCityCarsePar)
- Voter Registration [https://intrasql01/eVoter](https://intrasql01/eVoter)
- Phone Directory [https://nwlk.norwalkct.org/TelephoneDirectory](https://nwlk.norwalkct.org/TelephoneDirectory)
- Intranet Application [https://intrasql01/intranet](https://intrasql01/intranet)
- WEB/Intranet update [https://intrasql01/intraupd](https://intrasql01/intraupd)
- Postage [https://intranet01/postage](https://intranet01/postage)
- Online Appointment Hub [https://nwlk.norwalkct.org/noah](https://nwlk.norwalkct.org/noah)
- Online Appointment Manager [https://nwlk.norwalkct.org/appointmentManager](https://nwlk.norwalkct.org/appointmentManager)
- Norwalk Service Center [https://nwlk.norwalkct.org/servicecenter](https://nwlk.norwalkct.org/servicecenter)
- Vendor Payment Lookups [https://nwlk.norwalkct.org/vendorpayment](https://nwlk.norwalkct.org/vendorpayment)
- IT Help Desk [https://nwlk.norwalkct.org/ithelpdesk](https://nwlk.norwalkct.org/ithelpdesk)
- 2021 Tax Sales [https://storymaps.arcgis.com/stories/1fecdd4ac2c145b88567236f400927a1](https://storymaps.arcgis.com/stories/1fecdd4ac2c145b88567236f400927a1)
- Online Service Manager [https://intranet01/servicemanager](https://intranet01/servicemanager)
- IT Payroll Correction Form [https://forms.office.com/Pages/ResponsePage.aspx?pxid=n8vmuqXBEeqY18Z3awt0Zc2EMZYGWBOoeES4pIGNiGhUQ0Tc0UEZIRDDBCUEZKQzJRTEvHVZuWcM0c0W54](https://forms.office.com/Pages/ResponsePage.aspx?pxid=n8vmuqXBEeqY18Z3awt0Zc2EMZYGWBOoeES4pIGNiGhUQ0Tc0UEZIRDDBCUEZKQzJRTEvHVZuWcM0c0W54)
- IT Help Desk Feedback Form [https://forms.office.com/Pages/ResponsePage.aspx?pxid=n8vmuqXBEeqY18Z3awt0Zc2EMZYGWBOoeES4pIGNiGhUQ0Tc0UEZIRDDBCUEZKQzJRTEvHVZuWcM0c0W54](https://forms.office.com/Pages/ResponsePage.aspx?pxid=n8vmuqXBEeqY18Z3awt0Zc2EMZYGWBOoeES4pIGNiGhUQ0Tc0UEZIRDDBCUEZKQzJRTEvHVZuWcM0c0W54)
- Covid-19 Vaccination Proof [https://arcgis.is/018Kqi](https://arcgis.is/018Kqi)
- HR Employee Onboarding Notification [https://forms.office.com/Pages/ResponsePage.aspx?pxid=n8vmuqXBEeqY18Z3awt0Zc2EMZYGWBOoeES4pIGNiGhUQ0Tc0UEZIRDDBCUEZKQzJRTEvHVZuWcM0c0W54](https://forms.office.com/Pages/ResponsePage.aspx?pxid=n8vmuqXBEeqY18Z3awt0Zc2EMZYGWBOoeES4pIGNiGhUQ0Tc0UEZIRDDBCUEZKQzJRTEvHVZuWcM0c0W54)
- Board of Assessment Appeal [https://nwlk.norwalkct.org/baa](https://nwlk.norwalkct.org/baa)
- Budget Book [https://intranet01/ebudgetbook](https://intranet01/ebudgetbook)
- IT Invoice Submission [https://forms.office.com/Pages/ResponsePage.aspx?pxid=n8vmuqXBEeqY18Z3awt0Zc2EMZYGWBOoeES4pIGNiGhUQ0Tc0UEZIRDDBCUEZKQzJRTEvHVZuWcM0c0W54](https://forms.office.com/Pages/ResponsePage.aspx?pxid=n8vmuqXBEeqY18Z3awt0Zc2EMZYGWBOoeES4pIGNiGhUQ0Tc0UEZIRDDBCUEZKQzJRTEvHVZuWcM0c0W54)
- Reporting Center [http://intrasql03/reports/browse](http://intrasql03/reports/browse)
- Request IT Vendor Security Questionnaire Review [https://forms.office.com/g/m4NtICYcRU](https://forms.office.com/g/m4NtICYcRU)
- Budget Repository [https://forms.office.com/g/vJwSS1HIr](https://forms.office.com/g/vJwSS1HIr)

Source: Compiled by Evergreen, January 2022.
Exhibit 9-7 summarizes the approximate placement of the City on the digital transformation maturity model. IT through its efforts to assist departments with automation and the multiple competencies necessary to operate with the current staffing levels and service needs places in the “some” category for each of these areas. However, the majority of the elements reside at the limited level.

### Exhibit 9-7
**Approximate Status of the City Based on the Digital Transformation Maturity Model**

<table>
<thead>
<tr>
<th>Element</th>
<th>City Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Automated Processes</td>
<td>Some</td>
</tr>
<tr>
<td>Digital Documentation</td>
<td>Limited</td>
</tr>
<tr>
<td>Electronic Relationships</td>
<td>Limited</td>
</tr>
<tr>
<td>Electronic Services</td>
<td>Limited</td>
</tr>
<tr>
<td>Innovative Technology</td>
<td>Limited</td>
</tr>
<tr>
<td>Data-Driven Decision-Making</td>
<td>Limited</td>
</tr>
<tr>
<td>Staff Competencies</td>
<td>Some</td>
</tr>
</tbody>
</table>

Source: Created Evergreen Solutions, 2021.

If the City aspires to keep pace with its municipal peers and improve its overall service delivery capability, it will need to move to higher phases within the digital transformation maturity model. Among those local governments undergoing digital transformation, most possess the following tools:

- documentation of the technology needs and capabilities of the organization; and
- organizational technology plan.

The remainder of this section addresses the findings and recommendations for each.

**FINDING**

While IT strives to meet customer demand with limited resources, it lacks a comprehensive summary of current and future departmental needs. Given the absence of sufficient and up-to-date information on IT needs, priorities change regularly, customers operate without the benefit of consistent technology maximization support, and long-range planning of resources is limited. While IT does not use customer surveys for gauging satisfaction or needs at the transactional or service levels, IT staff expressed concerns with not being able to meet current and future needs as well as establishing linkages between expectations and resources.

For any service area, it is critical to employ a process for assessing customer need. Four common as well as simple steps to improve customer satisfaction with services include:

- *identification* – interact with customers to determine current and future needs based on their experience and operations;
- *plan* – assess current capabilities and prioritize the need and plan the approach;
- *develop* – create or source the product or service needed by the customer; and
- **monitor** – obtain customer feedback regularly to learn how your efforts meet their expectations.

Given the absence of current or future information on technology demand, a technology needs assessment is necessary to understand the current situation as well as chart future actions.

**RECOMMENDATION**

**Recommendation 9-4:**

Conduct an internal and external needs assessment to determine specific information technology shortcomings and needs of staff and other stakeholders (residents, visitors, commercial).

A Technology Needs Assessment is an evaluation of the technical tasks and functions. An organization must be capable of performing or the needs that technology must be able to meet. The common elements of a needs assessment include the following:

- gather data from stakeholders;
- review current capabilities;
- prioritize needs;
- identify themes;
- document functional needs;
- identify desired technology;
- cite technical requirements; and
- document results.

Given that technological needs changes rather dramatically from year to year, the City should engage its major stakeholders in an open format to determine their needs, concerns, priorities, and desires. This process should include interacting with community members, such as residents, visitors, and business owners as well as internal customers, including representatives from all departments.

**FISCAL IMPACT**

The estimated cost of conducting an assessment of information technology needs would be cost neutral, if led by internal staff. Once the CIO is hired, this should be part of his or her first duties.

**FINDING**

The City lacks a comprehensive Technology Plan. Effective and comprehensive technology planning is the foundation for successful technology implementation and development. Technology in a city is not simply a stand-alone program; it is a long-term ongoing effort that affects every aspect of government operations. The technology planning process is complicated. There are many factors to consider, including internal and external service delivery, data reporting, funding, training, and staffing for support and maintenance.
The key questions that a comprehensive technology plan will address include the following:

- Why do we do what we do?
- What problems or portions of problems are we focused on solving?
- Where are we going and how will we get there?
- What capabilities do we need?
- How will we know if we have succeeded?

On average, technology plans should cover between three to five years; due to the quickly changing nature of technology.

**RECOMMENDATION**

Recommendation 9-5:

**Develop and implement an organizational IT Plan.**

A more forward-thinking and comprehensive IT Plan would account for current technology needs as well as allow for reliable prediction of future IT needs, thus allowing for effective budget planning of IT expenses. The basic components of an IT plan appear in **Exhibit 9-8**.

### Exhibit 9-8
**Basic Components of an IT Plan**

<table>
<thead>
<tr>
<th>Overview</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organizational Needs</td>
</tr>
<tr>
<td>Governance and Structure</td>
</tr>
<tr>
<td>Future Vision</td>
</tr>
<tr>
<td>Short and Long Term Goals</td>
</tr>
</tbody>
</table>

*Source: Created by Evergreen, 2020.*
FISCAL IMPACT

This recommendation can be implemented with existing staff once the CIO is hired. A ballpark estimate of the potential cost of modernizing the current technology infrastructure and applications is between $5 to $10 million. Assuming a cost in the middle of $7,500,000 and the likelihood that the expenditures will be made over a period of years, the cost is split between the 2023-24 and 2024-25 fiscal years, thereby giving the City time to hire a CIO, and for the CIO to conduct a needs assessment and develop an IT Plan.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop and Implement an IT Plan</td>
<td>$0</td>
<td>$(3,750,000)</td>
<td>$(3,750,000)</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>

9.3 OPERATIONS

IT Operations refers to the processes, practices, and services necessary to meet the business needs of internal and external users. While strong operational practices and processes improve the chance of an organization meeting its goals and objectives, weak IT operational practices undermine the quality of services and the chance of organizational success. As a result, it is important that an organization’s IT operation meet ongoing needs, while assisting with improving business processes.

Research by Hewlett-Packard (HP) found that IT operations improve when implementing:

- reduced IT complexity;
- improved visibility and transparency across the entire IT infrastructure; and
- increased ability to make preemptive and immediate corrective actions that minimize risk.

In other words, the more that users in the departments understand the current capabilities and rules of engagement, the better the chance of success.

As highlighted in the Organization and Management Section 9.1, IT lacks the resources necessary to operate in an optimal manner even at the current level of digital transformation. However, even if the necessary resources were present some foundational elements should be put into place to prepare for new resources and ensure success.

FINDING

The IT Department possesses a strong commitment to customer service by attempting to address business needs and resolving user issues. While IT does not possess the staffing and strategic resources necessary to meet all customer needs, the assignment of staff time, culture of the department, and limited technology tools are leveraged to meet customer needs within current
limitations. While the development of custom packages to meet single process or sub-process needs is not ideal for an overall strategy, it exemplifies the commitment on the part of IT to address customer needs.

COMMENDATION

IT is committed to customer service.

FINDING

NPS and IT possess opportunities for collaboration that are not being realized. The City and NPS both plan for technology utilization, implement and service infrastructure, provide technical support, and interact with users. The overlap in duties offers both departments an opportunity to benefit from shared services.

Some of the major benefits include:

- reduce service delivery costs;
- assist with automated service delivery;
- standardize service delivery;
- eliminate redundancy in services;
- reduce silos;
- promote efficiency;
- increase productivity; and
- enable scaling.

Furthermore, the City and Schools both possess small staff teams and different levels of best practice implementation. For example, NPS has transitioned to more cloud-based and nationally supported software solutions. This is the path that the City will need to pursue in the future and affords both groups an opportunity to share knowledge and resources. Conversely, the City possesses some technical capabilities among its development staff that is not present among NPS staff.

RECOMMENDATION

Recommendation 9-6:

Develop an IT resource sharing and collaboration plan between the City and NPS.

Once completing the technology needs assessment process, leadership from the City and NPS should meet and examine areas for collaboration. Most commonly, technical support, system administration, and network management overlap between organizations.

FISCAL IMPACT

This recommendation can be implemented with existing staff once the CIO is hired.
FINDING

The City lacks a Technology Policy and Procedures Manual which serves as a rulebook and roadmap for successfully and properly utilizing available technology resources as well as detailing major processes for interacting with technology staff. In many cases, the contents of a Manual include copies of plans, polices, procedures, and necessary forms. The major operation areas include applications and infrastructure, end users, governance and policy, records, security, and social media.

This breadth of the documented areas improve an organization’s operations by:

- ensuring consistency in operations and access;
- protecting the integrity of technical resources and confidentiality of data;
- minimizing internal and external risks;
- preserving availability of resources to the appropriate groups.

RECOMMENDATION

Recommendation 9-7:

Create a Technology Policies and Procedures Manual.

As a minimum, technology policies and procedures should be documented and distributed, electronically to all major stakeholders. The most common sections and supporting documents appear in Exhibit 9-9.

<table>
<thead>
<tr>
<th>Exhibit 9-9</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Summary of a Standard Technology Plan</strong></td>
</tr>
</tbody>
</table>

| Overview | • Scope  
| Points of Contact  
| Documentation |
| Instructional Analysis | • Needs Analysis  
| Development Approach  
| Issues and Recommendations |
| Instructional Methods | • Training Methodology  
| Training Database  
| Testing and Evaluation |
| Training Resources | • Courses  
| Schedules  
| Future Opportunities |

*Source: Created by Evergreen Solutions, 2021.*
A key element of the Technology Plan and Procedure Manual should be the creation and implementation of data standards for the City. The current lack of data standards limits the City’s capability to join data from different systems, connect systems to streamline processes, and implement efficient dashboarding. In most cases, different systems and applications use different data standards and data formats. Digital data standards are an agreed upon collection of naming conventions and values. Used effectively, the standards provide a constant set of naming and structure guidelines, thus permitting system integration, commonality in interpretation and understanding, and basis for establishing performance measure-based management.

Some of the most common benefits include:

- improved data quality;
- increased data compatibility;
- improved consistency and efficiency of data collection;
- reduced data redundancy; and
- improved data access.

FISCAL IMPACT

This recommendation can be implemented with existing staff once the CIO is hired and free online resources.

FINDING

The City lacks a Technology Training Plan to ensure the required level of technological capability among City staff. As a result, staff possess varying levels of competency in the systems that support their internal workflows and operations.
The benefits of technology training for employees include:

- improve productivity, effectiveness, and efficiency of service by helping employees develop and better utilize their talents, skills, and potential;

- increase knowledge, skills, and abilities so that staff become better qualified to perform the duties of their present jobs and advance to more responsible positions;

- enhance managers and supervisors’ capabilities at organizing and developing effective management systems for the accomplishment of the organization's goals and objectives; and

- heighten employee satisfaction and reduced personnel turnover.

While IT does not collect technical competency data on City staff, departmental leadership from a variety of departments expressed a desire to receive for more software training and assistance. Specifically, most departments mentioned MUNIS as an area of need given its role across the City.

**Exhibit 9-9** shown previously summarizes the major sections utilized in a standard Technology Training Plan. The instructional analysis determines the competency needs by level and job type within each department as well as the best approach to improve outcomes. Based on the needs analysis, the training methodology is selected. A training database permits an organization to document the level of completion and link interactions with outcomes for testing and evaluation. Finally, the plan includes the courses or offerings, schedule, and anticipated opportunities.

Local colleges, universities, and technical schools are commonly seeking opportunities to enter into long-term partnering relationships with local governments to facilitate and introduce young college graduates to the workforce and potential employment in the public sector. The City already has an intern position in IT. Expanding this program to include bi-directional exchanges where City employees could receive low-to-no cost training from the host college would be reasonable.

**RECOMMENDATION**

**Recommendation 9-8:**

**Develop a technology competency and training plan for City employees.**

City staff would benefit considerably from additional training in the use of technology to facilitate high job performance. Developing higher expectations for technological skills will ensure that all employees are achieving maximum return on the City’s efforts to provide an advanced technological environment.

Specific goals should be established to guide each employee over the life of his or her career in the City. Web-based training opportunities should be identified and tied directly into the competency plan. The City should focus on free training opportunities. One basic area to begin with would be office productivity software training to equip employees utilizing spreadsheet,
database, or word processing software as is found in the Microsoft Office suite of programs to take advantage of its many options.

**FISCAL IMPACT**

Sufficient free training opportunities should be available to result in these training expectations and opportunities being leveraged at no direct cost to the City.
NORWALK PUBLIC SCHOOLS
Efficiency Study of the
Norwalk Public Schools

FINAL REPORT

Submitted by:

Evergreen Solutions, LLC
2878 Remington Green Circle
Tallahassee, Florida 32308

March 22, 2022
# TABLE OF CONTENTS

*Efficiency Study of Norwalk Public Schools*

<table>
<thead>
<tr>
<th>PAGE</th>
</tr>
</thead>
</table>

## CHAPTER 1: INTRODUCTION

1.1 Methodology .....................................................................................................................1

1.2 Comparison School Districts ............................................................................................3

## CHAPTER 2: SCHOOL ADMINISTRATION AND MANAGEMENT

2.1 Governance .......................................................................................................................6

2.2 Central Office Organization and Management ...............................................................12

2.3 Legal Services .................................................................................................................23

2.4 Campus-Level Administration .......................................................................................28

2.5 Strategic Planning ...........................................................................................................31

2.6 Policies and Procedures .................................................................................................39

## CHAPTER 3: FINANCIAL MANAGEMENT

3.1 Financial Management and Accounting .........................................................................46

3.2 Grants Management ........................................................................................................50

3.3 Asset and Risk Management .........................................................................................52

3.4 Management and Budget ...............................................................................................56

3.5 Purchasing and Accounts Payable ................................................................................61

3.6 Policies and Procedures .................................................................................................78

## CHAPTER 4 OPERATIONS

4.1 Facilities and Maintenance .............................................................................................81

4.2 Transportation .................................................................................................................101

4.3 Health Services ..............................................................................................................120

## CHAPTER 5: HUMAN RESOURCES

5.1 Organization and Management ......................................................................................128

5.2 Personnel Policies and Procedures .................................................................................132

5.3 Pension and Benefits ......................................................................................................135

5.4 Recruitment, Hiring, and Retention ...............................................................................138

5.5 Labor Relations ..............................................................................................................146

5.6 Performance Evaluation .................................................................................................147
## TABLE OF CONTENTS

### Efficiency Study of Norwalk Public Schools

<table>
<thead>
<tr>
<th>CHAPTER 6:  INFORMATION TECHNOLOGY</th>
<th>PAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>6.1 Organization and Management</td>
<td>151</td>
</tr>
<tr>
<td>6.2 Strategy</td>
<td>158</td>
</tr>
<tr>
<td>6.3 Operations</td>
<td>159</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>CHAPTER 7:  EDUCATIONAL OPERATING EFFICIENCIES</th>
<th>PAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.1 Staffing Allocations and Budgeting of Resources</td>
<td>166</td>
</tr>
<tr>
<td>7.2 Outsourcing and Contract Services</td>
<td>186</td>
</tr>
<tr>
<td>7.3 Maximizing Federal and State Funds</td>
<td>190</td>
</tr>
</tbody>
</table>
CHAPTER 1: INTRODUCTION
1.0 INTRODUCTION

In October 2021, Evergreen Solutions, LLC was retained by the City of Norwalk, Connecticut, to conduct an Efficiency Study of both City of Norwalk and Norwalk Public Schools (NPS). The study was intended to focus on the organizational, operational, and financial efficiency and effectiveness of City and NPS operations.

1.1 METHODOLOGY

Evergreen’s methodology for conducting the Efficiency Study was divided into two distinct phases – Phase I (project initiation and diagnostic review) and Phase II (in-depth analysis and reporting). The two phases were further disaggregated into several tasks, including the following:

Phase I

- initiating the project;
- collecting and reviewing existing reports and data sources; and
- conducting a diagnostic review, including interviews with School Board members, NPS leaders and department heads.

Phase II

- performing analyses and benchmarking with comparison school districts and best practice research;
- conducting the formal in-depth study with Evergreen consultants;
- formulating findings and recommendations; and
- preparing the draft and final reports.

Project Initiation

Project initiation included the initial step of developing a comprehensive understanding of NPS operations—including all departments and functional areas. Working with NPS leaders, Evergreen finalized the project timeline, work plan, and deliverables during this task. In addition, key projects stakeholders were identified and contact information was provided to Evergreen to establish effective lines of communication to be used throughout the study.
**Review of Existing Reports and Data Sources**

Initially, Evergreen provided NPS a list of data needs by department area. Staff responded to the request by placing the requested documents in an on-line folder created by the Chief Information Officer, who served as the NPS Project Director. Consultants examined the data provided and sought other existing reports and data sources that provided the Team with information related to the various administrative functions and operations to be reviewed in NPS.

Examples include, but are not limited to the following:

- school board policies and administrative procedures;
- organizational charts of each department;
- program and compliance reports;
- strategic and departmental plans;
- mission, vision, goals, objectives and performance standards;
- annual performance reports;
- independent financial audits;
- annual budget and expenditure reports;
- job descriptions;
- technology data;
- staffing data;
- salary schedules; and
- employee handbook.

Data were analyzed from each of these sources and others, and the information was used as a starting point for collecting additional data.

**Diagnostic Review**

The diagnostic review of Norwalk Public Schools was conducted during the first two weeks in November 2021. Evergreen consultants interviewed NPS School Board members, District leaders, department heads, and other employees concerning the management and operations of the school district.

**In-Depth Review**

The Evergreen Team conducted the formal review of NPS operations between November 2021 and January 2022, through a series of on-site visits, phone interviews and Zoom meetings. As part of the in-depth review, the following broad areas, systems and operations were examined:

- Administration and Management
- Finance Management
  - Grants
  - Purchasing and Accounts Payable
- School Operations
- Human Resources
  - Facilities and Maintenance
It is important to note that within the areas reviewed, Evergreen focused its in-depth study on each of the key functions found in the RFP. Where the diagnostic interviews identified areas of significant need, Evergreen consultants focused attention on those areas and performed extensive analysis to determine the root cause and possible solutions.

Prior to conducting the in-depth review, each Evergreen Team member was provided with an extensive set of information about NPS operations. Team members then conducted a detailed efficiency analysis of the structure and operations in their assigned functional areas.

Remote and in-person interviews, observations and document reviews occurred from November 2021 through February 2022.

Creating the Final Report

On February 16, NPS leaders and designated staff were provided an initial draft of the NPS portion of the report to validate the accuracy of findings. On February 23, Evergreen met in person with each group by chapter and during this one-day on-site session and during a series of follow-up calls, the findings were reviewed for accuracy and completeness. Changes to the draft were made when the accuracy of the data was in question, additional data or information was provided, or circumstances had changed since the time of the initial on-site work. Documentation to support those changes were obtained and verified prior to incorporating the information into the final report.

On Tuesday, March 22, the final report, including the City and NPS sections were delivered to a meeting of the Common Council and Board of Education.

1.2 COMPARISON SCHOOL DISTRICTS

For the purpose of comparative analysis, Evergreen identified, with the assistance and approval of the Superintendent and the NPS Project Manager, a group of school districts that possess similar demographic characteristics to NPS. Preliminary analysis examined these peer districts to determine points of comparison, best practices, and operational needs for Norwalk Public Schools.

Peer school districts selected are:

- Stamford, CT
- Greenwich, CT
- Fairfield, CT
- Westport, CT
- Danbury, CT
- White Plains, NY
- New Rochelle, NY
A comparison of these peers is shown in Exhibits 1-1 to 1-4.

### Exhibit 1-1
**Overview of Peer School Systems**  
**2019-2020**

<table>
<thead>
<tr>
<th>School District</th>
<th>Total Students</th>
<th>Total Staff</th>
<th>FTE Teachers</th>
<th>Pupil/Teacher Ratio</th>
<th>Pupil/Staff Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk</td>
<td>11,642</td>
<td>1,878</td>
<td>883</td>
<td>13</td>
<td>6.2</td>
</tr>
<tr>
<td>Stamford</td>
<td>16,479</td>
<td>2,505.6</td>
<td>1,317.6</td>
<td>12.51</td>
<td>6.6</td>
</tr>
<tr>
<td>Greenwich</td>
<td>9,015</td>
<td>1,477.0</td>
<td>747.5</td>
<td>12.06</td>
<td>6.1</td>
</tr>
<tr>
<td>Fairfield</td>
<td>9,624</td>
<td>1,712.3</td>
<td>848.1</td>
<td>11.35</td>
<td>5.6</td>
</tr>
<tr>
<td>Westport</td>
<td>5,312</td>
<td>919.8</td>
<td>473.2</td>
<td>11.23</td>
<td>5.8</td>
</tr>
<tr>
<td>Danbury</td>
<td>11,903</td>
<td>1,723.8</td>
<td>827.3</td>
<td>14.39</td>
<td>6.9</td>
</tr>
<tr>
<td>White Plains (NY)</td>
<td>7,155</td>
<td>1,146.1</td>
<td>619.1</td>
<td>11.56</td>
<td>6.2</td>
</tr>
<tr>
<td>New Rochelle (NY)</td>
<td>10,553</td>
<td>1,437.1</td>
<td>700.1</td>
<td>15.07</td>
<td>7.3</td>
</tr>
</tbody>
</table>

*Source: National Center for Education Statistics, 2021.*

### Exhibit 1-2
**Average Daily Membership**  
**2019-20**

<table>
<thead>
<tr>
<th>School District</th>
<th>KIND</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
<th>9</th>
<th>10</th>
<th>11</th>
<th>12</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk</td>
<td>823</td>
<td>833</td>
<td>829</td>
<td>773</td>
<td>849</td>
<td>902</td>
<td>856</td>
<td>905</td>
<td>899</td>
<td>1,055</td>
<td>952</td>
<td>950</td>
<td>814</td>
<td>11,716</td>
</tr>
<tr>
<td>Stamford</td>
<td>1,337</td>
<td>1,287</td>
<td>1,243</td>
<td>1,279</td>
<td>1,239</td>
<td>1,251</td>
<td>1,315</td>
<td>1,243</td>
<td>1,421</td>
<td>1,157</td>
<td>1,123</td>
<td>1,159</td>
<td>16,600</td>
<td></td>
</tr>
<tr>
<td>Greenwich</td>
<td>595</td>
<td>674</td>
<td>639</td>
<td>688</td>
<td>668</td>
<td>721</td>
<td>700</td>
<td>666</td>
<td>716</td>
<td>700</td>
<td>674</td>
<td>725</td>
<td>9,048</td>
<td></td>
</tr>
<tr>
<td>Fairfield</td>
<td>648</td>
<td>644</td>
<td>651</td>
<td>694</td>
<td>697</td>
<td>729</td>
<td>804</td>
<td>734</td>
<td>882</td>
<td>752</td>
<td>742</td>
<td>752</td>
<td>772</td>
<td>9,671</td>
</tr>
<tr>
<td>Westport</td>
<td>324</td>
<td>355</td>
<td>369</td>
<td>348</td>
<td>401</td>
<td>360</td>
<td>422</td>
<td>412</td>
<td>435</td>
<td>451</td>
<td>469</td>
<td>479</td>
<td>449</td>
<td>5,344</td>
</tr>
<tr>
<td>Danbury</td>
<td>920</td>
<td>902</td>
<td>929</td>
<td>901</td>
<td>926</td>
<td>941</td>
<td>937</td>
<td>937</td>
<td>863</td>
<td>966</td>
<td>803</td>
<td>848</td>
<td>785</td>
<td>11,928</td>
</tr>
<tr>
<td>White Plains, NY</td>
<td>535</td>
<td>536</td>
<td>544</td>
<td>512</td>
<td>545</td>
<td>500</td>
<td>557</td>
<td>542</td>
<td>551</td>
<td>525</td>
<td>607</td>
<td>532</td>
<td>514</td>
<td>7,069</td>
</tr>
<tr>
<td>New Rochelle, NY</td>
<td>787</td>
<td>769</td>
<td>759</td>
<td>716</td>
<td>791</td>
<td>834</td>
<td>705</td>
<td>742</td>
<td>766</td>
<td>1,014</td>
<td>820</td>
<td>793</td>
<td>687</td>
<td>10,286</td>
</tr>
<tr>
<td>Average</td>
<td>746</td>
<td>750</td>
<td>745</td>
<td>739</td>
<td>771</td>
<td>772</td>
<td>782</td>
<td>786</td>
<td>886</td>
<td>863</td>
<td>781</td>
<td>769</td>
<td>738</td>
<td>10,208</td>
</tr>
</tbody>
</table>

Source: NYS Education Department, 2021.*
Exhibit 1-3
Enrollment by Ethnicity
2019-20

<table>
<thead>
<tr>
<th>School District</th>
<th>Total Students</th>
<th>American Indian/Alaskan Native</th>
<th>Asian/Pacific Islander</th>
<th>Black</th>
<th>Hispanic</th>
<th>White</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Count</td>
<td>% of Total</td>
<td>Count</td>
<td>% of Total</td>
<td>Count</td>
<td>% of Total</td>
</tr>
<tr>
<td>Norwalk</td>
<td>11,716</td>
<td>18</td>
<td>0.2%</td>
<td>548   4.7%</td>
<td>1,768   15.1%</td>
<td>6,027   51.4%</td>
</tr>
<tr>
<td>Stamford</td>
<td>16,600</td>
<td>19</td>
<td>0.1%</td>
<td>1,202  7.2%</td>
<td>2,410   14.5%</td>
<td>7,391   44.5%</td>
</tr>
<tr>
<td>Greenwich</td>
<td>9,048</td>
<td>0</td>
<td>0.0%</td>
<td>763   8.4%</td>
<td>215     2.4%</td>
<td>2,022   22.3%</td>
</tr>
<tr>
<td>Fairfield</td>
<td>9,671</td>
<td>0</td>
<td>0.0%</td>
<td>585   6.0%</td>
<td>235     2.4%</td>
<td>1,129   11.7%</td>
</tr>
<tr>
<td>Westport</td>
<td>5,344</td>
<td>0</td>
<td>0.0%</td>
<td>354   6.6%</td>
<td>0       0.0%</td>
<td>366     6.8%</td>
</tr>
<tr>
<td>Danbury</td>
<td>11,928</td>
<td>11</td>
<td>0.1%</td>
<td>765   6.4%</td>
<td>866     7.3%</td>
<td>5,942   49.8%</td>
</tr>
<tr>
<td>White Plains, NY</td>
<td>7,069</td>
<td>1</td>
<td>0.0%</td>
<td>279   3.9%</td>
<td>860     12.2%</td>
<td>4,108   58.1%</td>
</tr>
<tr>
<td>New Rochelle, NY</td>
<td>10,286</td>
<td>11</td>
<td>0.1%</td>
<td>488   4.7%</td>
<td>2,089   20.3%</td>
<td>4,994   48.6%</td>
</tr>
<tr>
<td>Average</td>
<td>10,208</td>
<td>8</td>
<td>0.1%</td>
<td>623   6.0%</td>
<td>1,055   9.3%</td>
<td>3,997   36.7%</td>
</tr>
</tbody>
</table>

Source: NYS Education Department, 2021.

Exhibit 1-4
Free and Reduced Eligible Students
2019-20

<table>
<thead>
<tr>
<th>School District</th>
<th>Total Students</th>
<th>Free Lunch Eligible</th>
<th>Reduced Price Lunch Eligible</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Count</td>
<td>% of Total</td>
<td>Count</td>
</tr>
<tr>
<td>Norwalk</td>
<td>11,716</td>
<td>5,917 50.5%</td>
<td>1,274 10.9%</td>
</tr>
<tr>
<td>Stamford</td>
<td>16,600</td>
<td>8,524 51.3%</td>
<td>1,288 7.8%</td>
</tr>
<tr>
<td>Greenwich</td>
<td>9,048</td>
<td>1,382 15.3%</td>
<td>472 5.2%</td>
</tr>
<tr>
<td>Fairfield</td>
<td>9,671</td>
<td>1,233 12.7%</td>
<td>348 3.6%</td>
</tr>
<tr>
<td>Westport</td>
<td>5,344</td>
<td>154 2.9%</td>
<td>45 0.8%</td>
</tr>
<tr>
<td>Danbury</td>
<td>11,928</td>
<td>5,083 42.6%</td>
<td>1,177 9.9%</td>
</tr>
<tr>
<td>White Plains, NY</td>
<td>7,069</td>
<td>3,554 50.3%</td>
<td>369 5.2%</td>
</tr>
<tr>
<td>New Rochelle, NY</td>
<td>10,286</td>
<td>4,918 47.8%</td>
<td>485 4.7%</td>
</tr>
<tr>
<td>Average</td>
<td>10,208</td>
<td>3,846 34%</td>
<td>682 6%</td>
</tr>
</tbody>
</table>

Source: NYS Education Department, 2021.

As can be seen, NPS possesses many similarities to the group of peer school districts based on the comparison data in the exhibits. This process of comparison, albeit more in-depth, was used to not only select peer school districts but, throughout the report, to benchmark NPS against its peers.

Benchmarking data were derived from both readily available sources, such as the national and state databases, as well as from data collected through direct contact with the peer school districts. As such, Evergreen evaluators took great care in ensuring data were accurate. However, in some instances, peer school districts reported data that can only be confirmed to a certain extent, and therefore, some inconsistencies may exist between reported data and actual operational data. Nonetheless, this type of benchmarking is customary and considered best practice in conducting efficiency studies.
CHAPTER 2:
SCHOOL ADMINISTRATION
AND MANAGEMENT
2.0 SCHOOL ADMINISTRATION AND MANAGEMENT

The management of a school district involves cooperation between elected school board members and school district staff. The school board’s role is to set the policies by which a school district will be governed, approve the plans as set forth by the administration to implement those policies, approve the funding necessary to carry out the plans, and evaluate the results of the plans.

Once policies are adopted by the school board, it is the responsibility of the Superintendent and staff to establish administrative procedures or regulations to achieve the end results. These activities involve the hiring and retention of employees as well as ongoing communication with the community to ensure an understanding of the district’s efforts to accomplish these results.

Chapter 2 includes the following six sections:

2.1 Governance
2.2 Central Office Organization and Management
2.3 Legal Services
2.4 Campus-Level Administration
2.5 Strategic Planning
2.6 Policies and Procedures

2.1 GOVERNANCE

Local school boards have traditionally governed public education in the United States with authority vested in them by the state. From the mid-1800s through the early 1900s, the number of school boards increased dramatically. The last major reform of school boards involved a shift to smaller elected school boards comprised of community members with a professional superintendent as the CEO. There are approximately 95,000 school board members on 15,000 local boards across the nation. Most school boards have five to nine members.

School districts with quality governance have among other variables:

- a focus on student achievement and policy making;
- an effective management without micromanagement;
- a trusting and collaborative relationship with the Superintendent;
- a yearly evaluation of the Superintendent, according to mutually agreed upon goals;
- governance retreats for evaluation and goal setting;
- long-term service of school board members and the Superintendent; and
- a budget that provides needed resources.
The Norwalk Public Schools’ website states:

*The Board of Education is the governing body of the school district and derives its power and exists under the Constitution and General Statutes of the State of Connecticut and the regulations of the Connecticut State Board of Education.*

Section 10-220(a) of Connecticut General Statutes entitled *Duties of Boards of Education* states, “Each local or regional board of education shall maintain good public elementary and secondary schools”.

The role and duties of the Board and Board members as set forth in NPS Board Policy 9000 entitled *Role of Board and Members (Powers, Purposes, Duties).*

*The Board of Education shall exercise all the powers, duties, responsibilities, and obligations given to it by law.*

*Board members are responsible for being informed about schools and educational programs. Membership on the board obligates each member to spend sufficient time to be qualified to make decisions which are so important to the educational welfare of the children of the community.*

*Specifically, the duties of the Board of Education fall into the following classifications.*

1. *Employ an able and qualified Superintendent of Schools.*

2. *Adopt sound policies to govern the operation of the school system.*

3. *Interpret the education program to the public and enlist the cooperation of the public formulating school policy and programs.*

4. *Determine the financial needs and the physical and educational equipment necessary for school activities.*

5. *Direct the expenditure of monies appropriated for the support of the public schools.*

6. *Employ the necessary personnel, prescribe their respective terms of office and duties, and appraise their efficiency in terms of the value of their services to the community.*

In accordance with Board Policy 9000 (1) above, NPS is led by a Board of Education appointed Superintendent of Schools. Excerpts from Connecticut General Statutes Sec. 10-157 entitled *Superintendents: Relationship to local or regional board of education; verification of certification status; waiver of certification; written contract of employment; evaluation of superintendent by board of education state:*

(a) *Each local board of education for a municipality with (1) a population of ten thousand or more, (2) three or more public schools located in the municipality, and (3) two thousand or more resident students, as defined in section 10-262f, shall provide for the supervision*
of the schools under its control by a superintendent who shall serve as the chief executive officer of the board.

The superintendent shall have executive authority over the school system and the responsibility for its supervision. Employment of a superintendent shall be by election of the board of education.

A majority vote of all members of the board shall be necessary to an election, and the board shall fix the salary of the superintendent and the term of office, which shall not exceed three years. Upon election and notification of employment or reemployment, the superintendent may request, and the board shall provide a written contract of employment.

The board of education shall evaluate the performance of the superintendent annually in accordance with guidelines and criteria mutually determined and agreed to by such board and such superintendent.

In accordance with NPS Board Policy 9110 entitled Number of Members; Terms of Office, NPS is:

...governed by nine members known as the Board of Education. NPS nine board members shall be “elected by the electors of the City of Norwalk”, in accordance with NPS Board Policy 9020. Board members are elected for staggered terms with five members from Council districts and four members at large.

The current members of the Board of Education for Norwalk Public Schools, elected in November 2021, are shown in Exhibit 2-1.

### Exhibit 2-1
Norwalk Public Schools Board of Education
December 2021

<table>
<thead>
<tr>
<th>School Board Member</th>
<th>Position on School Board</th>
<th>Year Elected</th>
<th>Current Term Expires</th>
</tr>
</thead>
<tbody>
<tr>
<td>Colin Hosten</td>
<td>Chair</td>
<td>2019/2021</td>
<td>2025</td>
</tr>
<tr>
<td>Diana Carpio</td>
<td>Vice-Chair</td>
<td>2019</td>
<td>2023</td>
</tr>
<tr>
<td>Godfrey Azima</td>
<td>Secretary</td>
<td>2019</td>
<td>2023</td>
</tr>
<tr>
<td>Sheri McCready Brown</td>
<td>Member</td>
<td>2021</td>
<td>2025</td>
</tr>
<tr>
<td>Kara Nelson Baekey</td>
<td>Member</td>
<td>2021</td>
<td>2025</td>
</tr>
<tr>
<td>Erica DePalma</td>
<td>Member</td>
<td>2019</td>
<td>2023</td>
</tr>
<tr>
<td>Sherelle Harris</td>
<td>Member</td>
<td>2013/2019</td>
<td>2017/2023</td>
</tr>
<tr>
<td>Janine Randolph</td>
<td>Member</td>
<td>2021</td>
<td>2025</td>
</tr>
<tr>
<td>Mary Ellen Flaherty Ludwig</td>
<td>Member</td>
<td>2021</td>
<td>2023</td>
</tr>
</tbody>
</table>

Source: NPS Website, December 2021.

In addition to serving in their capacities of school board members, the Board members serve on several standing and advisory committees, and also served as liaisons to various community-based committees.
Exhibit 2-2 shows Board member NPS committee assignments with meeting schedules and the community-based committee assignments effective January 1, 2022, for the upcoming year.

### Exhibit 2-2

**Board Committee Assignments**

**Effective January 1, 2022**

<table>
<thead>
<tr>
<th>NPS Committee Name</th>
<th>Board Members Assigned</th>
<th>Meeting Schedule</th>
<th>Community Based Committee Name</th>
<th>Board Member Liaisons to Community-Based Committees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Finance</td>
<td>Colin Hosten, Chair Diana Carpio</td>
<td>2nd Wednesday</td>
<td>Norwalk ACTS</td>
<td>Colin Hosten Diana Carpio</td>
</tr>
<tr>
<td></td>
<td>Kara Nelson Baekey</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sherelle Harris</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Kara Nelson Baekey</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sheri McCready Brown</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Janine Randolph</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Policy</td>
<td>Diana Carpio, Chair Godfrey Azima</td>
<td>1st Tuesday</td>
<td>Norwalk Facilities Commission</td>
<td>Diana Carpio</td>
</tr>
<tr>
<td></td>
<td>Janine Randolph</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Mary Ellen Flaherty Ludwig</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Facilities Planning</td>
<td>Diana Carpio, Chair Kara Nelson Baekey</td>
<td>4th Wednesday</td>
<td>NEF Representative</td>
<td>Colin Hosten</td>
</tr>
<tr>
<td></td>
<td>Sherelle Harris</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Colin Hosten</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Curriculum and Instruction</td>
<td>Sherelle Harris, Chair Mary Ellen Flaherty Ludwig Erica DePalma Sheri McCready Brown</td>
<td>3rd Tuesday</td>
<td>City Master Plan</td>
<td>Diana Carpio</td>
</tr>
<tr>
<td>Special Ed Curriculum Subcommittee</td>
<td>Janine Randolph, Chair Erica DePalma Sherel</td>
<td>3rd Tuesday</td>
<td>PTOC/SGC</td>
<td>Janine Randolph</td>
</tr>
<tr>
<td>MLL Curriculum Subcommittee</td>
<td>Diana Carpio, Chair Colin Hosten</td>
<td>3rd Wednesday</td>
<td>Wellness</td>
<td>Godfrey Azima</td>
</tr>
<tr>
<td></td>
<td>Sheri McCready Brown</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ad-Hoc Inclusion and Educational Justice</td>
<td>Godfrey Azima, Chair Sheri McCready Brown Kara Nelson Baekey</td>
<td>1st Wednesday</td>
<td>CES Representative</td>
<td>Mary Ellen Flaherty-Ludwig</td>
</tr>
</tbody>
</table>

Source: NPS Superintendent’s Office December 30, 2021.

The Standing Committees of the Board of Education and the duties of each committees are outlined in Board Policy 9130.1 as follows:

**Executive Committee**
- To choose the time and place of Board meetings and to set the agendas for such meetings. The Executive Committee shall consist of the Board Chairperson, Vice Chairperson, and Secretary.
Curriculum and Instruction Committee
- To review all curriculum and instructional programs at all levels of the school system, and to recommend to the Board curriculum enhancements in accordance with state requirements and national best practices.
- To serve as the district curriculum committee under C.G.S. Sec. 10-220(e)
- To serve as the district professional development committee under C.G.S. Sec. 10-220a(b).
- To review and recommend approval of textbooks and other curricular materials as specified by law.
- To monitor the effectiveness of approved programs.

Finance Committee
- To work with the Superintendent and Chief Financial Officer to develop (i) rolling three-year proforma budgets and (ii) the official budget for the following fiscal year.
- To hold public meetings and recommend changes in the budgets.
- To submit the proforma and official budgets to the Board for final approval, briefing the Board on their development and impact on the overall educational program, and on the alignment of the budgets with the goals for the schools approved by the Board.
- To keep the Board informed on school financial legislation.
- To report to the Board on a regular basis the status of the current fiscal year’s budget and projections for year-end results.
- To keep the public informed on the budget’s status at its monthly meetings and at other times as necessary.

Negotiations and Personnel Committee
- To negotiate, on behalf of the Board and in collaboration with the Superintendent, all collective bargaining agreements with unions representing Board employees; provided, that all non-arbitrated proposed contract agreements shall be submitted to the full Board for approval, and in the case of negotiations which result in arbitration, that the Committee will make reasonable efforts to communicate with the Board regarding the status of negotiations and arbitration decisions that must be made by the Committee.
- To review and make recommendations concerning personnel policies for all employees of the Board.
- To review and approve evaluation procedures for employee groups as required by law.

Policy Committee
- To review and, when needed, propose revisions to all Board policies, regulations and Bylaws as needed to ensure consistency with the district mission statement, strategic plan, and best practices.
- Together with Board counsel and other advisors, to review and, when needed, propose revisions to all Board policies, regulations, and Bylaws for compliance with state and federal laws.
- To develop new Board policies as appropriate.
- To monitor implementation of adopted policies.

School Facilities / Planning Committee
- To recommend building use policies, including rental rate policy.
• To review population trends and the effect on school enrollments.
• To review proposals for optimal facility utilization and districting of students.
• To review and prepare plans for alterations and renovations to school facilities.
• To review and prepare plans for safety and security enhancements to school facilities.
• To prepare a five-year capital improvement plan.
• To work with the City Facilities Construction Commission regarding school facilities construction projects.

Other Committees
• The Board Chairperson may appoint temporary committees to study special topics or issues from time to time, naming the members and chairpersons of such committees.

FINDING
School board members are provided and encouraged to attend professional development.

School Board Policy 9230 entitled Orientation of Board Members requires incoming school board members to, within 30 days of taking office, receive an orientation about matters relative to Board and school district operations. District records show the school board orientation training meeting was held December 10, 2021. NPS Board members took office November 17, 2021, and received orientation December 10, 2021, well within the 30-day requirement.

Exhibit 2-3 shows an outline of the school board orientation agenda and school board member attendance. All board members are encouraged to attend important trainings such as this orientation. Such training is vital to an understanding of the Board’s functions, policies, and procedures. New school board members often describe orientations as a time of transition to learn about new responsibilities for Board business.

Exhibit 2-3
NPS Board Orientation and Participation
December 10, 2021

<table>
<thead>
<tr>
<th>Board Member Attendance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Colin Hostin, Diane Caprio, Mary Ellen Flaherty-Ludwig, Sheri McCready-Brown, Kara Nelson Baekey, Janine Randolph, Godfrey Azima</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Agenda</th>
</tr>
</thead>
<tbody>
<tr>
<td>Call to Order</td>
</tr>
<tr>
<td>Pledge of Allegiance</td>
</tr>
<tr>
<td>Warm Up Exercise</td>
</tr>
<tr>
<td>Central Office Team Introductions</td>
</tr>
<tr>
<td>Overview of Board Member Rights and Responsibilities and Scenarios</td>
</tr>
<tr>
<td>Review of Board/Superintendent Communications Protocol</td>
</tr>
<tr>
<td>Primer on the Freedom of Information Act</td>
</tr>
<tr>
<td>Adjournment</td>
</tr>
</tbody>
</table>

Source: NPS Board Minutes, January 2022.

COMMENDATION
School Board members are offered opportunities for professional growth and development.
2.2 **CENTRAL OFFICE ORGANIZATION AND MANAGEMENT**

The organizational structure and management system of a public school district are key factors in determining the district’s ability to meet its goals and operate in an effective and efficient manner. An effective organizational structure systematically arranges the functional areas of the school district in a manner that supports its mission and goals. A successful organization has the capacity to alter its structure to meet changing needs. The management system of a school district—including the ability to make informed decisions, communicate effectively, and provide appropriate planning and accountability functions—ultimately determines the extent to which the school district can successfully carry out its mission and accomplish its goals.

The development and maintenance of an effective organizational structure for a local school district is a formidable task. Fundamentally, an organizational structure is a support system, designed to facilitate the primary mission of the school district and sustain its efforts to accomplish its goals. To the extent that the mission of the school district does not drive its organizational structure, the support system is weakened, and consequently the organization's ability to accomplish its primary mission is compromised.

The current NPS Superintendent follows a long list of superintendents who have been at the helm of the school district the last several years. The average tenure of NPS superintendents is less than four years, with four of the nine school district leaders since 2002 serving as interim superintendent—one of which served three years.

Superintendents that have served since 2002 are shown in **Exhibit 2-4**.

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Start Date</th>
<th>End Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Salvatore Corda</td>
<td>Superintendent</td>
<td>01/01/2002</td>
<td>09/08/2009</td>
</tr>
<tr>
<td>William Pappalo</td>
<td>Interim Superintendent</td>
<td>08/03/2009</td>
<td>02/19/2010</td>
</tr>
<tr>
<td>Michael Nast</td>
<td>Interim Superintendent</td>
<td>02/10/2010</td>
<td>06/30/2010</td>
</tr>
<tr>
<td>Anthony Daddona</td>
<td>Interim Superintendent</td>
<td>08/18/2012</td>
<td>07/17/2013</td>
</tr>
<tr>
<td>Susan Marks</td>
<td>Superintendent</td>
<td>07/01/2010</td>
<td>08/17/2012</td>
</tr>
<tr>
<td>Manuel Rivera</td>
<td>Superintendent</td>
<td>07/18/2013</td>
<td>01/30/2015</td>
</tr>
<tr>
<td>James Connelly</td>
<td>Interim Superintendent</td>
<td>02/02/2015</td>
<td>07/14/2015</td>
</tr>
<tr>
<td>Steven Adamowski</td>
<td>Superintendent</td>
<td>07/15/2015</td>
<td>06/30/2020</td>
</tr>
<tr>
<td>Alexandra Estrella</td>
<td>Superintendent</td>
<td>07/01/2020</td>
<td>Present</td>
</tr>
</tbody>
</table>

*Source: NPS Superintendent’s Office, December 2021.*

**FINDING**

Superintendent Estrella is a member of and participates in several professional associations which provides her networking opportunities with other schools and superintendents, on-line resources to data and professional development opportunities. The Superintendent was appointed July 1, 2020, serves on several statewide committees, and is invited to speak at various venues.
An excerpt from NPS Board Policy 2131 entitled *Superintendent of Schools* states:

*The Superintendent shall keep informed by advanced study, by visiting school systems in other cities, by attendance at educational conferences and by other means, relative to modern educational thought and practices.*

The Superintendent recently presented as an expert panelist at a *Leadership, Change and Improvement in Education* class for the Connecticut Center for School Change (now Partners for Educational Leadership). As a result of her professional activities, the Superintendent maintains associations important to remain current with educational trends and initiatives.

**Exhibit 2-5** shows examples of the Superintendent’s participation with professional associations.

**Exhibit 2-5**  
Superintendent’s Professional Associations  
January 2022

<table>
<thead>
<tr>
<th>Association Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Connecticut Partners for Change</td>
</tr>
<tr>
<td>Connecticut Association of Public-School Superintendents</td>
</tr>
<tr>
<td>Connecticut Leadership Institute</td>
</tr>
<tr>
<td>Connecticut Association of Urban Superintendents</td>
</tr>
<tr>
<td>Southern Fairfield County Superintendents Association</td>
</tr>
<tr>
<td>Connecticut Association of Schools</td>
</tr>
<tr>
<td>Greater Norwalk Chamber of Commerce</td>
</tr>
<tr>
<td>National Association of Bilingual Educators</td>
</tr>
<tr>
<td>National School Superintendent Associations</td>
</tr>
</tbody>
</table>

*Source:  NPS Superintendent's Office, January 2022.*

**COMMENDATION**

The Superintendent’s participation in professional associations provides NPS access to online resources, networking, and professional development opportunities.

**FINDING**

When the current Superintendent took office, the administration identified an issue relating to the alignment or job descriptions with organizational charts and began a process for updating and aligning the positions, organization charts and job duties. NPS is in its first year of restructured central office roles and responsibilities implemented to better align with the new strategic plan.

NPS documents state:

*...the District performed a complete review and analysis of the leadership team structure, processes, and responsibilities, including activities such as:*

- reviewed central office structures and systems;
- met with Chiefs to review their work, review current data, and direct report performance and, and hear their plans to help improve student achievement;
• interviewed and reviewed resumes for senior staff;
• identified current and anticipated leadership vacancies;
• discussed current communication structure;
• assessed current cycles of current data-driven instruction; and
• reviewed leadership development plans.

The May 2021 Strategic Plan working draft document detailed organizational shifts eliminating and adding cabinet-level positions.

Exhibit 2-6 shows the positions eliminated and positions added.

Exhibit 2-6
NPS Cabinet Position Changes – May 2021

<table>
<thead>
<tr>
<th>Senior Level Positions Eliminated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Academic Officer</td>
</tr>
<tr>
<td>Chief of Specialized Learning &amp; Student Services</td>
</tr>
<tr>
<td>Chief of Operations</td>
</tr>
<tr>
<td>Chief Talent Officer</td>
</tr>
<tr>
<td>Chief of Communications</td>
</tr>
<tr>
<td>Chief of Digital Learning &amp; Development</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Senior Level Positions Added</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deputy Superintendent of Equity &amp; Inclusion</td>
</tr>
<tr>
<td>Assistant Superintendent of Schools</td>
</tr>
<tr>
<td>Assistant Superintendent of Digital Learning &amp; Innovation</td>
</tr>
<tr>
<td>Assistant Superintendent of Business &amp; Operations</td>
</tr>
<tr>
<td>Chief of Staff &amp; Communications</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Unchanged Senior Leadership Position</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief Financial Officer</td>
</tr>
</tbody>
</table>

Source: NPS Superintendent’s Office, December 2021.

Exhibit 2-7 shows the organizational chart currently used for Norwalk Public Schools Leadership Team. As the chart shows, the Superintendent’s cabinet-level positions include:

• Deputy Superintendent for Excellence, Equity and Inclusion
• Chief Financial Officer
• Assistant Superintendent for Business and Operations
• Assistant Superintendent of Digital Learning and Innovation
• Assistant Superintendent for Schools
• Chief of Staff and Communications

The current job descriptions for these positions as updated in February 2022 show these positions reporting to the Superintendent.

Job descriptions for positions below the cabinet level continue to show reporting discrepancies, but as stated above, revisions to the job descriptions and organization charts are a work in progress.
Interviews indicate substantial turnover in critical areas, such as Human Resources and Legal Services, and changes in titles have caused confusion. Communication as to which positions do what, and where positions are housed within the organization, is needed to clearly delineate and communicate employee roles and responsibilities.

**Exhibit 2-8** shows Board Policy 2121 entitled *Line of Responsibility* which sets forth the expectations of the central office.
Exhibit 2-8
NPS School Board Policy 2121
Line of Responsibility

Book Policy Manual, Section 2000 – Administration, Title Line of Responsibility
Code 2121, Status Active, Adopted September 29, 1985, Last Revised May 16, 1995

LINE OF RESPONSIBILITY

Lines of responsibility in this school system shall, to the fullest extent, be structured so that

1. the administration shall be encouraged to work out the education most appropriate for the student.
2. responsibility shall flow simply and clearly to student through teachers, administrators, and the Superintendent, from the Board of Education.
3. each member of the staff shall be told to whom he/she is responsible and for what functions.
4. whenever possible, each member of the staff shall be made responsible to only one immediate supervisor for any one function.
5. each staff member shall be told to whom he/she can appeal in case of disagreement with the person to whom the staff member is responsible.
6. each staff member shall be told to whom he/she can go for help in working out his/her own functions in the school system program.
7. each staff member shall be kept advised of the policies, functions, and progress of the school system.

Source: NPS Website, December 2021.

Clearly, in the midst of restructuring, additional efforts to maintain information about the reporting structure and the roles and responsibilities of the leadership positions are needed. Ensuring that staff and the public are aware of the current structure during this restructuring process is an important step in building confidence in the system.

RECOMMENDATION

Recommendation 2-1:

Continue creating and publishing the most updated organization charts and current job descriptions to ensure proper communication of NPS’ organization structure.

NPS is in the process of building standards and mechanisms for keeping the information current and published on the website.

FISCAL IMPACT

This recommendation can be implemented with existing resources.
FINDING

The central office organization structure, created during the reorganization, includes positions of Chief of Staff and Communications, Communications Manager, and Executive Assistant that is not functionally necessary.

The District reorganized, effective July 2021, adding the position of Deputy Superintendent for Excellence, Equity, and Innovation and restructured the position of Chief of Communications to Chief of Staff and Communications. Exhibit 2-9 shows the current organization structure of the positions in this area.

Exhibit 2-9

Communications Organization

![Diagram of Communications Organization]

Source: Norwalk Public Schools, November 2021.

Effective February 2022, the bilingual parent liaison now reports to the instructional side of the house, so that position is no longer within this group. As shown, the position of Digital Communications Specialist is currently vacant, and those duties are partially handled by existing staff. NPS priority is social media and digital communication. As such, capacity will shift to those areas thus making the Communications Manager another redundancy. The Executive Assistant position is tied to the Chief of Staff and Communications position and no longer needed.

A review of job descriptions and interviews indicates redundancies (functional similarities) between the positions of Deputy Superintendent for Excellence, Equity, and Innovation and the Chief of Staff and Communications. Excerpts from the job description for the Deputy Superintendent for Excellence, Equity, and Innovation outline the position description and functional responsibilities such as:

The Deputy of Equity, Excellence and Inclusion will serve as Superintendent in the absence of the Superintendent. The Deputy will develop, implement and monitor programs and processes that promote and sustain equity and diversity throughout the district.
Excerpts from the job description of the Chief of Staff and Communications outline essential functions such as:

- **Provide executive assistance to the Superintendent in supporting and ensuring effective communication with the Board of Education.**

- **Serve as the Superintendent’s liaison in monitoring and facilitating the progress of staff-led projects and initiatives.**

- **Stay attuned to the concerns and positions of community individuals and groups relative to district activities and plans.**

In addition, as **Exhibit 2-7** above shows, most cabinet positions report, either directly by job description or as a designation, to the Deputy Superintendent. The Deputy Superintendent provides day-to-day leadership for the District and is in the unique position to speak and act on behalf of the Superintendent.

**RECOMMENDATION**

**Recommendation 2-2:**

**Eliminate the positions of Chief of Staff and Communication, Communications Manager, and Executive Assistant and reorganize the communications function under the Deputy Superintendent.**

Creating a Director of Communications position and assigning responsibilities specific to communications streamlines that function and will allow the Deputy to organize the department to focus on the priorities of the district and address the digital and social media needs of the organization.

Elimination of the positions of Chief of Staff and Communications, Communication Manager and Executive Assistant will allow creation of a department structure under the Director of Communications, including the Digital Communications Specialist and a Specialist to be determined that will handle other identified needs of the section and serve as back up to the director as needed.

**Exhibit 2-10** shows the proposed reorganization which adds a Director of Communications, reporting to the Deputy Superintendent and a Specialist reporting to the Director of Communications.
Exhibit 2-10
Proposed Communications Department
Organizational Chart

The District should redistribute duties in the Chief of Staff and Communications, Communications Manager, and Executive Assistant job descriptions to existing staff.

FISCAL IMPACT

<table>
<thead>
<tr>
<th>Position</th>
<th>Added/Eliminated</th>
<th>Salary</th>
<th>BOE Benefits(30%)</th>
<th>Total Salary and Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chief of Staff and Communication</td>
<td>Eliminated</td>
<td>$218,000</td>
<td>$65,400</td>
<td>$283,400</td>
</tr>
<tr>
<td>Communications Manager</td>
<td>Eliminated</td>
<td>$80,000</td>
<td>$24,000</td>
<td>$104,000</td>
</tr>
<tr>
<td>Executive Assistant</td>
<td>Eliminated</td>
<td>$84,000</td>
<td>$25,200</td>
<td>$109,200</td>
</tr>
<tr>
<td>Director of Communications</td>
<td>Added</td>
<td>($150,000)</td>
<td>($45,000)</td>
<td>($195,000)</td>
</tr>
<tr>
<td>Specialist to be determined</td>
<td>Added</td>
<td>($117,000)</td>
<td>($35,100)</td>
<td>($152,100)</td>
</tr>
<tr>
<td>Net Savings</td>
<td></td>
<td>$115,000</td>
<td>$34,500</td>
<td>$149,500</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reorganize the Communications Function</td>
<td>$149,500</td>
<td>$149,500</td>
<td>$149,500</td>
<td>$149,500</td>
<td>$149,500</td>
</tr>
</tbody>
</table>
FINDING

NPS has not in the past centrally tracked its Freedom of Information Act (FOIA) requests. NPS Board Policy 9330 entitled Board/School System Records requires nonexempt records to be made available to the general public. Evergreen requested the last three year’s Freedom of Information documentation. Rather than the requested three years, NPS provided a spreadsheet, reproduced in Exhibit 2-11, which covers a time period of approximately the last six months and includes:

- the dates received;
- dates acknowledged;
- dates completed; and
- the requestor.

Exhibit 2-11

NPS Freedom of Information Requests Spreadsheet
June 15, 2021 – December 2, 2021

<table>
<thead>
<tr>
<th>Date Freedom of Information Request Received</th>
<th>Date Freedom of Information Request Acknowledged</th>
<th>Date Freedom of Information Request Completed</th>
<th>Freedom of Information Requestor</th>
</tr>
</thead>
<tbody>
<tr>
<td>6/15/2021</td>
<td>6/15/2021</td>
<td>12/1/2021</td>
<td>Beth Slack</td>
</tr>
<tr>
<td>9/15/2021</td>
<td>9/17/2021</td>
<td>12/1/2021</td>
<td>Barbara Meyer-Mitchell</td>
</tr>
<tr>
<td>9/22/2021</td>
<td>9/23/2021</td>
<td>9/24/2021</td>
<td>Mike Cavallo</td>
</tr>
<tr>
<td>9/30/2021</td>
<td>10/1/2021</td>
<td>10/11/2021</td>
<td>Merry Wong</td>
</tr>
<tr>
<td>10/16/2021</td>
<td>10/19/2021</td>
<td>11/3/2021</td>
<td>Johnathan Riddle</td>
</tr>
<tr>
<td>10/15/2021</td>
<td>10/20/2021</td>
<td></td>
<td>Catherine Slack-SMG</td>
</tr>
<tr>
<td>11/3/2021</td>
<td></td>
<td></td>
<td>Smart Procure</td>
</tr>
<tr>
<td>11/9/2021</td>
<td></td>
<td></td>
<td>Lewis</td>
</tr>
<tr>
<td>11/10/2021</td>
<td>11/10/2021</td>
<td>11/10/2021</td>
<td>Buchs</td>
</tr>
<tr>
<td>10/15/2021</td>
<td>10/20/2021</td>
<td></td>
<td>Brian Brown</td>
</tr>
<tr>
<td>11/16/2021</td>
<td>10/20/2021</td>
<td></td>
<td>D. Smirniratopolous</td>
</tr>
<tr>
<td>11/16/2021</td>
<td>11/16/2021</td>
<td></td>
<td>D. Smirniratopolous</td>
</tr>
<tr>
<td>2 weeks prior to 11/18</td>
<td>11/18/2021</td>
<td></td>
<td>B Gaylord</td>
</tr>
<tr>
<td>11/16/2021</td>
<td>11/16/2021</td>
<td>11/23/2021</td>
<td>Emily Morgan</td>
</tr>
<tr>
<td>1/24/2021</td>
<td>11/24/2021</td>
<td></td>
<td>Cassandra Day</td>
</tr>
<tr>
<td>12/2/2021</td>
<td>12/2/2021</td>
<td></td>
<td>Emily Morgan</td>
</tr>
</tbody>
</table>

The Chief of Staff and Communications reported that the District transferred the FOIA function from the Communications Department to the Human Resources Department a few years ago. A review of the November 17, 2020, job description for the position of Legal Services Counsel in the Human Resources Department shows responsibility “for all management and responses to Freedom of Information Act (FOIA) requests” listed under essential duties and responsibilities. District staff attribute gaps in accounting to turnover in the Human Resources Department.
The Labor Services Counsel uses a spreadsheet to track requests and responses to the requestors. According to the records provided at the time of this review, 21 FOIA requests were received between June 2021 and December 2021 for an average of about four a month. Of the 21 requests received, eight (or about one-quarter) show completed with one taking about six months to resolve.

The NPS website is “under construction” with direction to send FOIA requests to the Human Resources Department. Requests come into the District exclusively by email, generally to the Human Resources Department, but sometimes directly to other departments. Requests received by other departments are not tracked nor monitored to ensure compliance with the Act but rather are forwarded to Human Resources for response and monitoring. The Labor Services Counsel relies on the various departments to forward FOIA requests. The Labor Services Counsel is knowledgeable of FOIA requirements and deadlines, but the website including instructions on filing an FOIA request and an established fee schedule is a work in progress

**Exhibit 2-12** shows the NPS Board Policy relative to access to public records.

### Exhibit 2-12

**NPS Board Policy 9330 - Board/School System Records**  
(Last Revised February 4, 2003)

<table>
<thead>
<tr>
<th>Book-Policy Manual, Section 9000 – Bylaws of the Board, Title Board/School System Records, Code 9330</th>
</tr>
</thead>
</table>

**BOARD/SCHOOL SYSTEM RECORDS**

The Superintendent of Schools and Board secretary shall make records available for the inspection of the general public except where the law specifically states that a matter is exempt from such disclosure.

Therefore, the Board of Education directs the Superintendent and the board secretary, acting jointly and cooperatively, to make easily available copies of the Board of Education policy manual and the minutes of meetings of the Board of Education and its committees (except as exempt by law). Minutes shall be made available for public inspection within seven days of the session to which they refer.

Policies shall be incorporated into the policy manual within thirty days of adoption.

**Legal**

1-18a Definitions (“Public records or files”)
1-19 Access to public records. Exempt records (as amended by PA 02-133)
1-19a Access to computer-stored records
1-19b Agency administration. Disclosure of personnel, birth, and tax records…
1-20a Public employment contracts as public record
1-21 Meeting of government agencies to be public. Recording of votes, schedule, and agenda of meetings to be filed. Notice of special meetings.
Executive sessions 1-21a Recording, broadcasting, or photographing meetings.
1-21f Regular meetings to be held pursuant to regulation, ordinance, or resolution
1-21i Denial of access to public records.

**Cross References**

13–0 - Access to School Procedures and Materials  
4112.06 / 4212.6 - Personnel Records  
51–5 - Student Records: Confidentiality

*Source: NPS Website, December 2021.*
Since the pandemic, the NPS has been responding electronically with no paper copies. Connecticut General Statutes Sec. 1-212. (Formerly Sec. 1-15). Copies and scanning of public records - Fees outlines what fees can be charged for information requests. The District, also, is not charging requestors for staff or contracted legal services research time.

The Connecticut Freedom of Information Act is a series of laws that guarantee public access to public records of governmental entities such as NPS. Public records include any recorded data or information prepared, owned, used, received, or retained by the public entity. These data or information requested can be handwritten, typed, tape-recorded, printed, photocopied, photographed, or recorded. Anyone has standing to request public records without regard to purpose. Response time for Connecticut’s open records requests is “promptly”. Without adequate accounting and documentation of Freedom of Information Requests and their disposition, compliance cannot be determined.

According to Pullman and Comley in a presentation to CABE, Connecticut Association of Boards of Education:

*Persons have a right to inspect records “promptly”; Connecticut General Statutes §1-210(a); and a right to receive “promptly” copies of such records. Connecticut General Statutes §1-212(a).*

*A denial of a request must be made in writing within four business days of the request; failure to comply within this time period is deemed a denial. Connecticut General Statutes §1-206(a).*

*As such, within four business days of the request, at least tell the requesting party the general status of compliance with the request and, more specifically, whether you are going to deny or withhold certain (or all of the) documents that have been requested.*

Regardless of the time requirements to acknowledge, respond or deny Freedom of Information Act requests, adequate accounting ensures compliance is documented.

**RECOMMENDATION**

**Recommendation 2-3:**

*Assign responsibility to the Labor Relations Legal Counsel to ensure adequate monitoring and accounting of Freedom of Information Act requests.*

An explanation of appropriate FOIA handling procedures showing employee responsible for receipt, documentation, and processing of requests should be prepared and distributed to all department heads. Labor Relations Counsel should continue developing the NPS website with procedures to file a request and establish appropriate fee schedules. The District should design its website to encourage requestors use the NPS website to ensure that requests are appropriately tracked. The District’s FOIA requests and resolutions should be tracked and monitored and the requestors should be charged an appropriate fee for FOIA administration.
NPS should hire a Legal Assistant responsible for managing the day-to-day monitoring, follow-up activities, and documentation of the process through resolution.

**FISCAL IMPACT**

Assuming staff spend a minimum of two (2) hours per week performing research related to FOIA requests, and the hourly rate of an administrative position ($169,125 plus 69.89 percent benefits of $118,201) equals $287,386 divided by 260 days divided by 8 hours per day equals $138.14 per hour for 100 hours (2 hours per week for 50 weeks) is $13,815. Elimination of payments to contracted legal services providers would be $4,545 annually ($22,723 spent on contracted FOI legal services over a five-year period divided by five years is $4,545 per year).

Assuming NPS receives 42 (21 requests for 6 months x 2) FOIA requests that average 5 copies each at 50 cents per copy (21 x 2 x 5 x 50 cents) equals $105.

The addition of a support position to provide clerical assistant for the FOIA process at $50,000 annually plus BOE benefit costs of 30 percent totals $65,000 annually.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure Adequate Monitoring of FOIA Requests</td>
<td>$18,465</td>
<td>$18,465</td>
<td>$18,465</td>
<td>$18,465</td>
<td>$18,465</td>
</tr>
<tr>
<td>Add Support Position</td>
<td>($65,000)</td>
<td>($65,000)</td>
<td>($65,000)</td>
<td>($65,000)</td>
<td>($65,000)</td>
</tr>
</tbody>
</table>

2.3 **LEGAL SERVICES**

School districts throughout the country procure legal services either through in-house counsel, with the use of outside counsel for situations for which additional expertise is required, or exclusively with outside firms or attorneys. In the latter situation, some school districts, particularly those in urban areas, secure the services of a single, diversified firm while other school districts must depend on more than one firm. Fees for services vary greatly, depending on the location and the specialization required.

Across the country, the costs for legal work in school districts have increased over the last three decades due to a number of circumstances. These factors include due process activity associated with disciplinary proceedings, complicated issues related to special education students, risk management matters, and a variety of other issues. Areas of special education and student disciplinary activity often require special legal expertise. These areas are typically complicated by the demands of federal requirements and the relationship to local and state regulations, as well as the need to maintain an orderly educational environment.

**FINDING**

NPS lacks sufficient legal services management. NPS strives to control legal services costs with Superintendent’s prior approval required for staff to access outside legal services, however legal fees continue to mount.
NPS legal services are provided by in-house legal counsel, by Corporate legal counsel for the City, as well as outsourced legal services with Shipman & Goodwin as the primary provider. NPS legal assignments indicate outside counsel is contracted for services (such as union contract negotiations, investigations, trainings, Board policies and certain grievances).

In-house legal services—such as Freedom of Information issues, certain grievances, Title IX, etc.—are handled by the Labor Relations Attorney in the NPS Human Resources Department. The City Attorney helps fill the gap between the previous and current in-house attorney and provides legal services for matters such as workers’ compensation and Human Rights.

**Exhibit 2-13** shows a summary of the NPS legal assignments.

### Exhibit 2-13

**NPS Legal Assignments**

**Provided to Evergreen December 2021**

<table>
<thead>
<tr>
<th>In House Legal Counsel for NPS</th>
<th>NPS Board Counsel</th>
<th>Corporate Legal Counsel</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Barbara Namani, Esquire</strong></td>
<td>Shipman &amp; Goodwin</td>
<td>City Of Norwalk</td>
</tr>
<tr>
<td>• Title IX</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Sexual Harassment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Grievances</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Step 1 – Employee Relations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Step 2 – Legal Counsel</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Step 3 – Outside /Counsel</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Meditation Hearings</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• New Employee Handbook</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• FOIA</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Unemployment</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Fingerprints</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Training &amp; Updates to the HR Team on new labor laws, regulations. COVID policies, guidelines-legislatures, etc.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• ARCTEL Agreements spell out</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• DCF Spell out</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Review of EECO/Affirmative Action Plan Policy and provide recommendations</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Social Media Policy</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Any claims and possible litigations working in tandem with outside counsel and possibly Corporate Counsel as well if and when needed or required.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Performs other duties as assigned by the Superintendent or Director of HR</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Attorney Thomas Mooney**

**Attorney Natalia Sieira Millan**

**Attorney Jeffrey Spahr**

• All District Union Contract Negotiations
• Districtwide Trainings
• Investigations
• Step 3 Grievances
• Meditation Hearings
• Board Policies
• Social Media Policy

• All BOE CHIRO MATTERS
• Other: Workers’ Compensation Claims:
  • Mike Gillon Manager- Self Insured
  • Accounts for Norwalk Public Schools
  • Joe Salcito Sr. Claims – CIRMA
  • Reps for BOE
  • Kelsey Jacques Claims Adjuster CIRMA
  • Craig Schmidt – Risk Manager- City of Norwalk (Risk Management)
  • Attorney Heather Porto - Handles all Workers Comp matters


Although Evergreen requested and received documents relative to legal services from various sources; current or original contracts or evidence of contract management were not located. While there might be other documents available, Evergreen was provided, or obtained through independent research, documents such as:

- Halloran Sage: Engagement of Services dated August 30, 2021, for environmental site assessment which included Standard Terms of Engagement for Legal Services;
District/City: Internal emails dated 2019 and 2020 establishing rates and utilization for reporting to the State Board of Education Financial System (EFS) formerly ED001 Reporting;

Shipman & Goodman: Notice of Services undated but referenced legal requirement to communicate rates effective July 1, 2021; and

Shipman and Goodman: District compiled, at NPS Board request, a 10-year summary of legal fees billed in the amount of $1,648,909 for the period 2010-11 through early 2019-2020.

Exhibit 2-14 shows a legal fees by category.

<table>
<thead>
<tr>
<th>Legal Fee Category</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Negotiations</td>
<td>$795,387</td>
</tr>
<tr>
<td>Litigation &amp; Grievances</td>
<td>$580,758</td>
</tr>
<tr>
<td>General</td>
<td>$272,764</td>
</tr>
<tr>
<td><strong>Total Fees Billed</strong></td>
<td><strong>$1,648,909</strong></td>
</tr>
</tbody>
</table>

Source: Evergreen Compiled from CFO Spreadsheet, January 2022

District Finance staff provided a multi-year accounting of legal services. Exhibit 2-15 shows expenditures for outsourced legal services by provider for the general categories of Board of Education, Human Resources, and Specialized Learning. As Exhibit 2-15 shows, the largest increase is in the Shipman Goodwin line item from $102,433 in 2018-2019 to $425,959 in 2020-2021. This increase is reportedly a result primarily of an environmental study done under the legal department to protect information and is a non-recurring expense. Another cause for the spike in fees is the renegotiation of labor contract during the same period.
### Exhibit 2-15
NPS Legal Expenses
FY 2019 to December 2021

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>BOE</td>
<td>HR</td>
<td>SL</td>
</tr>
<tr>
<td>Gerald Weiner</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jackson Webber</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thomson Reuters West</td>
<td></td>
<td>$420</td>
<td></td>
</tr>
<tr>
<td>Shipman Goodwin</td>
<td>$425,959</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Pullman Comley</td>
<td>$5,376</td>
<td>$3,648</td>
<td>$9,024</td>
</tr>
<tr>
<td>Frederick Ward</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Halloran &amp; Sage</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CT Dept. of Labor</td>
<td>$600</td>
<td>$600</td>
<td>$600</td>
</tr>
<tr>
<td>Cheryl Damato</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Lawrence Cafero</td>
<td>$15,000</td>
<td></td>
<td>$15,000</td>
</tr>
<tr>
<td>Berchem Moses</td>
<td>$32,984</td>
<td>$33,026</td>
<td>$181,735</td>
</tr>
<tr>
<td>AAA</td>
<td>$1,125</td>
<td></td>
<td>$1,125</td>
</tr>
<tr>
<td>Gail Mangs</td>
<td></td>
<td>$800</td>
<td></td>
</tr>
<tr>
<td>Mitchell CarolAnn Pasquarella</td>
<td>$12,000</td>
<td></td>
<td>$12,000</td>
</tr>
<tr>
<td>Wendella Ault Battey</td>
<td>$5,400</td>
<td></td>
<td></td>
</tr>
<tr>
<td>J. Burr</td>
<td>$121</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Eprofit</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cassian Reporting</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Misc</td>
<td>($9,810)</td>
<td>$242</td>
<td>($9,568)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>$482,634</strong></td>
<td><strong>$43,457</strong></td>
<td><strong>$182,535</strong></td>
</tr>
</tbody>
</table>

Source: NPS CFO Staff, January 2022.
BOE = Board of Education
HR = Human Resources
SL = Specialized Learning
Exhibit 2-16 provides summary costs for legal services for the fiscal years 2018-2019 to 2021-22 through December 2021. As this exhibit shows, legal services costs have fluctuated but increased significantly from 2018-2019 through 2020-2021.

Exhibit 2-16  
NPS Legal Expenses  
FY 2019 to December 2021

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Board of Education</td>
<td>$239,591</td>
<td>$481,509</td>
<td>$238,021</td>
<td>$195,511</td>
<td>59%</td>
</tr>
<tr>
<td>Human Resources</td>
<td>$6,224</td>
<td>$44,582</td>
<td>$32,823</td>
<td>$1,348</td>
<td>97%</td>
</tr>
<tr>
<td>Specialized Learning</td>
<td>$226,943</td>
<td>$182,535</td>
<td>$196,435</td>
<td>$286,982</td>
<td>(57%)</td>
</tr>
<tr>
<td>Total</td>
<td>$472,758</td>
<td>$708,626</td>
<td>$467,280</td>
<td>$483,841</td>
<td>32%</td>
</tr>
</tbody>
</table>

Source: NPS CFO, October 2021.

As shown above, costs associated with legal services have increased for NPS, and if trends continue the overall legal costs for the 2021-22 fiscal year will exceed the prior year costs.

Halloran Sage’s *Standard Terms of Engagement for Legal Services, How Fees Will Be Set*, provides a potential framework for NPS to use as a tool for evaluation. Excerpts from the Halloran Sage *Terms of Engagement* outlining items for consideration are as follows:

- time and effort required, the novelty and complexity of issues and necessary skills required;
- fees customarily charged for similar services;
- amount of money or value of property involved and results obtained;
- time constraints;
- nature of professional relationship;
- experience, reputation, and expertise of attorney providing services; and
- extent of efficiency.

RECOMMENDATION

Recommendation 2-4:

Manage contracts to reduce costs of legal services to 2018-19 levels.

Legal services increased by more than 30 percent since fiscal year 2018-19. The district CFO should analyze and evaluate the distribution and costs of legal services (in house and outsourced), renegotiate legal services contracts, and establish a system of approval and monitoring to ensure the most efficient utilization of resources.
FISCAL IMPACT

Outsourced legal services costs have increased from $483,841 in FY 19 to $708,626 in FY 21, for an increase of $224,784 due in part to the environmental study. To hold the line on legal costs, NPS should set a goal of reducing legal expenditures by $150,000 since the environmental study is concluded, and then maintaining costs at that level in the coming years.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reduce Legal Services Costs</td>
<td>$150,000</td>
<td>$150,000</td>
<td>$150,000</td>
<td>$150,000</td>
<td>$150,000</td>
</tr>
</tbody>
</table>

2.4 CAMPUS-LEVEL ADMINISTRATION

NPS has approximately 11,700 students attending 21 schools in the City of Norwalk. Norwalk Public Schools consists of 12 elementary schools, four middle schools, four high schools, one inclusive pre-school program, and several magnet schools. NPS touts its rich diversity as a key part of the District’s strength. NPS students come from a variety of backgrounds, with more than 41 percent of students speaking a second language at home.

Principals are supervised by two Executive Directors of Leadership Development both of whom, according to the organizational charts provided to Evergreen, report to the Deputy Superintendent for Excellence Equity and Inclusion. The two Executive Directors of Leadership Development each oversee half of the principals as well as educational administrators within the Leadership Development Department. An excerpt from the May 14, 2021, job description for the Executive Directors of Leadership Development states these positions report to an Assistant Superintendent of Schools, Teaching and Learning, but interviews indicate reporting to the Deputy Superintendent for Excellence, Equity, and Inclusion.

The position description states the following:

The Executive Director of Leadership Development will provide guidance and direction to principals and assistant principals/CISDs to become transformational leaders who can build and articulate a shared vision for their schools, create high performance expectations, provide support and supervision for staff, effectively lead the school’s instructional program, and encourage meaningful collaboration among all stakeholders. S/he will supervise and evaluate their performance and provide support to school administrators in the development of meaningful and achievable school improvement practices and plans. Directing and aligning with the work of the Education Administrators for School Support and Improvement and the Education Administrator for School Quality, s/he will create and manage cycles of support to schools to ensure their improvement. This position will report directly to the Assistant Superintendent of Schools, Teaching & Learning.

Exhibits below show statistics representing the District’s staff, school staff, and administrative staff, relative to its peers. Exhibit 2-17 shows Central and School Administrator data for NPS compared to its peers. As the exhibit shows the NPS percent of central administrators to total
staff is 1.2 percent versus the average of 1.3 percent for its peers. NPS ties with two other peer districts to rank third lowest of its peers in central administrators to total staff.

**Exhibit 2-17** shows school administrators as a percent of total staff for 2.4 percent versus the average of 2.1 percent for its peers. As can be seen, NPS is third highest in school administrators to total staff.

### Exhibit 2-17
**NPS and Peer Data**
**Central Administrators and School Administrators**
**2019-20 School Year**

<table>
<thead>
<tr>
<th>School District</th>
<th>Total Students</th>
<th>Total Staff</th>
<th>Central Administrators</th>
<th>School Administrators</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Count</td>
<td>% of Total</td>
<td>Pupil/Emp Ratio</td>
<td>Count</td>
</tr>
<tr>
<td>Norwalk</td>
<td>11,642</td>
<td>1,878</td>
<td>23</td>
<td>1.2%</td>
</tr>
<tr>
<td>Stamford</td>
<td>16,479</td>
<td>2,505.6</td>
<td>47</td>
<td>1.9%</td>
</tr>
<tr>
<td>Greenwich</td>
<td>9,015</td>
<td>1,477.0</td>
<td>18</td>
<td>1.2%</td>
</tr>
<tr>
<td>Fairfield</td>
<td>9,624</td>
<td>1,712.3</td>
<td>30</td>
<td>1.7%</td>
</tr>
<tr>
<td>Westport</td>
<td>5,312</td>
<td>919.8</td>
<td>24</td>
<td>2.6%</td>
</tr>
<tr>
<td>Danbury</td>
<td>11,903</td>
<td>1,666.6</td>
<td>19</td>
<td>1.2%</td>
</tr>
<tr>
<td>White Plains, NY</td>
<td>7,155</td>
<td>1,146.1</td>
<td>5</td>
<td>0.4%</td>
</tr>
<tr>
<td>New Rochelle, NY</td>
<td>10,553</td>
<td>1,437.1</td>
<td>6</td>
<td>0.4%</td>
</tr>
<tr>
<td><strong>Average</strong></td>
<td><strong>10,210</strong></td>
<td><strong>1,593</strong></td>
<td><strong>21</strong></td>
<td><strong>1.3%</strong></td>
</tr>
</tbody>
</table>


This exhibit shows 500 pupils to employee versus 721 for its peer average and ranks fourth lowest of its peers. School administrators show 258 pupils to employees versus its peers of 331 and ranks third lowest of its peers.

**Exhibit 2-18** shows NPS Administrative Support Staff relative to its peer districts at the district and school levels. As the chart indicates, NPS administrative support staff is 2.4 percent compared to the average of peers of 3.6 percent. NPS ranks third highest of its seven peers. As shown:

- NPS school administrative support is 2.4 percent of total staff in comparison to peer districts at 2.1 percent, slightly above the peer average and ranking 4th highest of the peers.

- NPS administrative support staff pupil to employee ratio is 264 compared to peer districts average of 287, ranking third lowest of peers.

- NPS school administrative support staff pupil to employee ratio is 260 compared to peer districts average of 236, ranking third highest of peers.
Exhibit 2-18
NPS Administrative Support Ratios
2019-20 School Year

<table>
<thead>
<tr>
<th>School District</th>
<th>Total Students</th>
<th>Total Staff</th>
<th>Admin Support Staff</th>
<th>School Admin Support Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Count</td>
<td>% of Total</td>
<td>Pupil/Emp Ratio</td>
<td>Count</td>
</tr>
<tr>
<td>Norwalk</td>
<td>11,642</td>
<td>1,878</td>
<td>44</td>
<td>2.4%</td>
</tr>
<tr>
<td>Stamford</td>
<td>16,479</td>
<td>2,505.6</td>
<td>29</td>
<td>1.2%</td>
</tr>
<tr>
<td>Greenwich</td>
<td>9,015</td>
<td>1,477.0</td>
<td>33</td>
<td>2.2%</td>
</tr>
<tr>
<td>Fairfield</td>
<td>9,624</td>
<td>1,712.3</td>
<td>30</td>
<td>1.8%</td>
</tr>
<tr>
<td>Westport</td>
<td>5,312</td>
<td>919.8</td>
<td>16</td>
<td>1.7%</td>
</tr>
<tr>
<td>Danbury</td>
<td>11,903</td>
<td>1,666.6</td>
<td>31</td>
<td>1.9%</td>
</tr>
<tr>
<td>White Plains, NY</td>
<td>7,155</td>
<td>1,146.1</td>
<td>88</td>
<td>7.7%</td>
</tr>
<tr>
<td>New Rochelle, NY</td>
<td>10,533</td>
<td>1,437.1</td>
<td>140</td>
<td>9.7%</td>
</tr>
<tr>
<td>Average</td>
<td>10,208</td>
<td>1,593</td>
<td>51</td>
<td>3.6%</td>
</tr>
</tbody>
</table>


Exhibit 2-19 shows statistics on NPS students, teachers, and staff. The NPS pupil teacher ratio of 13 ties with the peer district average of 13, ranking third highest of peers. NPS pupil to staff ratio is 6.2 compared to peer average of 6, ties for 4th highest of peers.

Exhibit 2-19
NPS Pupil to Teacher and Staff Ratios
2019-20 School Year

<table>
<thead>
<tr>
<th>School District</th>
<th>Total Students</th>
<th>Total Staff</th>
<th>FTE Teachers</th>
<th>Pupil/Teacher Ratio</th>
<th>Pupil/Staff Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk</td>
<td>11,642</td>
<td>1,878</td>
<td>883</td>
<td>13.18</td>
<td>6.2</td>
</tr>
<tr>
<td>Stamford</td>
<td>16,479</td>
<td>2,505.6</td>
<td>1,317.6</td>
<td>12.51</td>
<td>6.6</td>
</tr>
<tr>
<td>Greenwich</td>
<td>9,015</td>
<td>1,477.0</td>
<td>747.5</td>
<td>12.06</td>
<td>6.1</td>
</tr>
<tr>
<td>Fairfield</td>
<td>9,624</td>
<td>1,712.3</td>
<td>848.1</td>
<td>11.35</td>
<td>5.6</td>
</tr>
<tr>
<td>Westport</td>
<td>5,312</td>
<td>919.8</td>
<td>473.2</td>
<td>11.23</td>
<td>5.8</td>
</tr>
<tr>
<td>Danbury</td>
<td>11,903</td>
<td>1,723.8</td>
<td>827.3</td>
<td>14.39</td>
<td>6.9</td>
</tr>
<tr>
<td>White Plains, NY</td>
<td>7,155</td>
<td>1,146.1</td>
<td>619.1</td>
<td>11.56</td>
<td>6.2</td>
</tr>
<tr>
<td>New Rochelle, NY</td>
<td>10,533</td>
<td>1,437.1</td>
<td>700.1</td>
<td>15.07</td>
<td>7.3</td>
</tr>
<tr>
<td>Average</td>
<td>10,210</td>
<td>1,600</td>
<td>802</td>
<td>12.73</td>
<td>6.4</td>
</tr>
</tbody>
</table>


FINDING

The organization of principals under the two Leadership Development Executive Directors establishes a reasonable span of control for the two Executive Directors to ensure that principals and campus staff receive the level of support they need from central office.

Exhibit 2-20 lists the organizational assignment of Principals to the Executive Directors in the Leadership Development Department as presented to Evergreen. As shown, supervision of school administrators is divided between the two Executive Directors. Assignment of Principals to the Executive Directors is determined by “experience, preference, and equity of numbers”. Administrators told the Evergreen Team that the campus assignments will be assessed annually.
**Exhibit 2-20**

**Leadership Development Executive Directors**

**Organizational Assignments**

**January 2022**

<table>
<thead>
<tr>
<th>Leadership Development Executive Director I</th>
<th>Leadership Development Executive Director II</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brien McMahon High School</td>
<td>Cranbury Elementary School</td>
</tr>
<tr>
<td>Brookside Elementary School</td>
<td>Fox Run Elementary School</td>
</tr>
<tr>
<td>Center for Global Studies (CGS)</td>
<td>Naramake Elementary School</td>
</tr>
<tr>
<td>Columbus Magnet School K-8 (CMS)</td>
<td>Tracey Magnet School</td>
</tr>
<tr>
<td>Jefferson Elementary School</td>
<td>Wolfpit Elementary School</td>
</tr>
<tr>
<td>Kendall College and Career Academy</td>
<td>Marvin Elementary School</td>
</tr>
<tr>
<td>Nathan Hale Middle School</td>
<td>Roton Middle School</td>
</tr>
<tr>
<td>Norwalk Early Childhood Center (NECC)</td>
<td>Rowayton Elementary School</td>
</tr>
<tr>
<td>Norwalk High School</td>
<td>Silvermine Elementary School</td>
</tr>
<tr>
<td>Ponus Ridge STEAM Academy</td>
<td>West Rocks Middle School</td>
</tr>
<tr>
<td>P-Tech Norwalk</td>
<td></td>
</tr>
</tbody>
</table>

*Source: NPS Human Resources Department, January 2022.*

**COMMENDATION**

The current organization structure establishes an appropriate span of control for the Executive Directors based on current needs, and the proposed annual reassessment will ensure that the campuses are provided the educational and administrative support they require.

### 2.5 **STRATEGIC PLANNING**

Planning is essential for the successful functioning of a complex organization such as a school district and is one of the most important activities of a School Board and administration. The planning process is critical for identifying goals, benchmarks, and measurements, for assessing progress toward achieving goals, and for determining alternative courses of action based on those assessments. Planning also guides the school district in resource allocation for goal accomplishment, in identifying staff needs, and in selecting professional development needs in order to reach intended ends. Consolidating all of those aspects of the planning process in a concerted, thoughtful, strategic manner facilitates the district’s execution of its educational programs and activities.

Evaluation of planning efforts must be ongoing, consistent, and objective. Evaluation must provide staff information to judge progress and set a course of action to achieve long-term school district, administrative, instructional, and student success. Effectively used, it forms a basis for professional as well as district and student growth. Effective planning and evaluation are the most elemental components of effective resource management. Decisions that affect the educational service delivery system and its resources should be based on comprehensive data analysis and systematic planning.

The strategic plan clearly states the organization’s mission, upon which decisions will be based, sets forth goals and objectives the Board expects the school district to accomplish for its
students, identifies explicit measurements that will be used to monitor progress, and assigns accountability to individuals or groups in the system. The strategic plan guides the Board as it makes decisions regarding policy focus and resource allocation.

In order for a strategic plan to steer a school district and its employees in their decisions and actions for children, it must:

- be constantly used as a basis for decisions;
- be continually examined as to its applicability for students and the school system as time progresses and circumstances change;
- have benchmarks specifically identifying how progress will be measured; and
- have benchmarks that must be continually examined for fine-tuning and determination of success.

**FINDING**

NPS approved its 2021-2026 *Future Ready for All* Strategic Plan in July 2021. The District contracted with the Connecticut Center for School Change, now Partners for Educational Leadership, to facilitate the NPS strategic planning process. Beginning October 2020, the Connecticut Center for School Change worked with the District and community stakeholders to assess the District's current position, establish beliefs and core values, identify strengths and weaknesses, and develop a plan to strategically meet the needs of the District.

Outlined in an interim strategic planning meeting on May 18, 2021, a working plan draft described the strategic planning process as follows:

*By direction of the Norwalk Board of Education and under the leadership of the Superintendent, Norwalk Public Schools launched a strategic planning process in January 2021. The Strategic Planning Task Force—a representative body of stakeholders—met regularly through the winter and spring in order to:*

- Broadly engage students, family, faculty, staff, administrators, community members and civic leaders
- Conduct a needs assessment
- Synthesize findings from organizational reviews conducted by outside service providers
- Produce a mission, core values, and strategic priorities
- Work with outside technical service providers and internal experts to identify aligned strategies, timelines, and indicators of success.

Board approval of NPS *Future Ready for All* 2021-2026 Strategic Plan established NPS components as:

- mission;
- vision;
- core values;
Administration and Management

- strategic priorities;
- theories of action;
- areas of focus;
- actions, and;
- indicators.

Exhibit 2-21 details the components of NPS 2021-2026 strategic plan.

Exhibit 2-21
NPS Strategic Plan Components
July 1, 2021

Mission
Norwalk Public Schools provides an excellent and equitable education, so ALL students graduate future ready as civically responsible, globally engaged, and positive contributors to an ever-changing and diverse world.

Vision
Norwalk Public Schools is building a more equitable and just world where each and every Norwalk student is prepared for all aspects of life.

Values
- Equity
- Student Potential
- Excellence
- Relationships
- Integrity
- Coordinated Services
- Continuous Improvement
- Creativity and Innovation
- Our People
- Diversity and Inclusion

Strategic Priorities
1. Future Readiness – Prepare all students so they are ready for further education, career, and workplace opportunities, and globally engaged leadership.
2. Equity – Ensure equitable opportunities, facilities, experiences, and outcomes for all students.
3. Excellence – Achieve excellence in all aspects of our organization through effective systems, modern learning environments and continuous improvement processes.
4. Engagement – Ensure all children, families, team members and the community are informed, are involved, and feel welcome in our schools.
5. High-Quality Instruction and Support – Foster relevant and intellectually stimulating learning with targeted supports than produce social, emotional, and academic growth.

Indicators of Success
On-Track-Future Readiness, measured longitudinally and disaggregated by starting point, race, class and national origin. Includes key measures of:
- academic and career readiness at key grade transitions,
- successful enrollment in postsecondary education and training, and
- workforce entry success.

Includes metrics:
1. percent on track to future readiness, disaggregated by student group
2. percent of students with a quality Academic and Career Plan (Student Success Plan, disaggregated by student group.

Participation Rate
Extent of disproportionality in academic access and discipline
School climate survey findings

Source: NPS Final Strategic Plan, July 2021.
Exhibit 2-22 shows NPS Strategic Priority Number 1: Future Readiness with its theory of action, areas of focus, actions, and indicators of progress as an example of the five strategic priorities adopted by the Board.

### Exhibit 2-22

**NPS Strategic Plan Strategic Priority 1: Future Readiness**  
**July 1, 2021**

<table>
<thead>
<tr>
<th>Strategic Priority 1: FUTURE READINESS – Prepare all students so they are ready for further education, career, and workplace opportunities, and globally engaged leadership.</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Theory of Action:</strong> If we clarify and focus on the skills and competencies most essential for success in college, career or globally engaged leadership, and if we can create the pathways and opportunities to grow those skills and competencies, then we can expand the number of students we graduate future ready.</td>
<td></td>
</tr>
<tr>
<td><strong>Areas of Focus</strong></td>
<td></td>
</tr>
<tr>
<td>• Future Readiness</td>
<td></td>
</tr>
<tr>
<td>• Education &amp; Career Pathways</td>
<td></td>
</tr>
<tr>
<td><strong>Action:</strong></td>
<td></td>
</tr>
<tr>
<td>• Define Future Readiness</td>
<td></td>
</tr>
<tr>
<td>• Ensure Access to Early Postsecondary Opportunities</td>
<td></td>
</tr>
<tr>
<td>• Provide Aligned Advising</td>
<td></td>
</tr>
<tr>
<td>• Create and Expand Choice</td>
<td></td>
</tr>
<tr>
<td>• Define and Broaden Global Citizenship</td>
<td></td>
</tr>
<tr>
<td>• Strengthen Student Success Plan</td>
<td></td>
</tr>
<tr>
<td><strong>Indicators:</strong></td>
<td></td>
</tr>
<tr>
<td>On-Track-Future Readiness, measured longitudinally and disaggregated by starting point, race, class and national origin. Includes key measures of:</td>
<td></td>
</tr>
<tr>
<td>• academic and career readiness at key grade transitions,</td>
<td></td>
</tr>
<tr>
<td>• successful enrollment in postsecondary education and training, and</td>
<td></td>
</tr>
<tr>
<td>• workforce entry success.</td>
<td></td>
</tr>
<tr>
<td>Includes metrics:</td>
<td></td>
</tr>
<tr>
<td>• percent on track to future readiness, disaggregated by student group</td>
<td></td>
</tr>
<tr>
<td>• percent of students with a quality Academic and Career Plan (Student Success Plan, disaggregated by student group.</td>
<td></td>
</tr>
</tbody>
</table>

_NPS Superintendent’s Office, December 2021._

**COMMENDATION**

Norwalk Public Schools is implementing its Strategic Plan.

**FINDING**

Performance measures in the NPS Strategic Plan are not consistently quantifiable. The District identifies performance indicators of success and metrics to be established, but Evergreen was not provided documentation of the development and implementation of the metrics to measure performance. Without quantifiable performance measures, NPS is unable to adequately assess
the progress toward meeting the goals and strategic outcomes of their strategic plan. The District uses, in certain instances, time as a measure of milestones and is developing capacity to establish and implement quantifiable performance measures.

Performance measures help ensure accountability and link actions to progress. Exhibit 2-23 shows an example of specific performance measures. Measures are relevant quantifiable performance statements of targets within specific time periods. Pinellas County Florida Public Schools’ 2021-2022 Annual Budget document includes performance measures as shown in the exhibit.

Exhibit 2-23
Example Quantifiable Performance Measures
2021-22

<table>
<thead>
<tr>
<th>Goal 1 Promotion and Graduation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1 Increase successful promotion rates in grades 3, 6 and 9 to at least 95 percent for each student subgroup.</td>
</tr>
<tr>
<td>1.2 Increase graduation rates for each student group leading to the achievement of at least 93 percent districtwide graduation rate and increase the rate by at least 2 percentage points for each subgroup below the district average to at least 90 percent.</td>
</tr>
<tr>
<td>1.3 Increase the percent of 9th graders earning at least 6 credits and maintaining a 2.0 minimum Grade Point Average (GPA) by the end of freshman year to 90 percent.</td>
</tr>
<tr>
<td>1.4 Increase the percent of students earning Algebra I credit by the end of ninth grade to 90 percent.</td>
</tr>
</tbody>
</table>

Source: Pinellas County Public Schools Annual Budget 2021-2022.

Subsequent to Evergreen’s fieldwork, the Superintendent updated the Board and public on Strategic Plan progress in NPS Half-Year Update on February 1, 2022. The Superintendent discussed the Online Portfolio which “will be a live document updated throughout the year with metrics and artifacts on annual strategic goals.” The Online Portfolio will include Roadmaps to Success, Benchmarks and Final Outcomes to continually measure and communicate progress toward goals. An example of quantifiable measures of performance indicators presented in the Half-Year Update is Goal 4. Goal 4, Data Dashboards, “will include items such as current assessments, on track for graduation, etc.”. NPS Research and Evaluation Project will refine and better align current metrics and data system with new Strategic Plan.

RECOMMENDATION

Recommendation 2-5:

Continue to enhance performance measures within the NPS Strategic Plan.

NPS has established indicators of performance and updated its Strategic Plan to better measure and communicate progress. NPS should continue to establish quantifiable measures to show progress toward a specific goal such as identified in Exhibit 2-23 above.

FISCAL IMPACT

This recommendation can be implemented with existing resources.
FINDING

NPS budget documents do not reflect alignment to the strategic priorities. District documents used for budget development such as the Documentation for Budget Request Form 2022/2023, and the Operating Budget Development Staff Addition/Reduction Request 2022-23 forms do not routinely include reference to the strategic priority or goal. References linking strategic planning goals to budget specifics are optional.

An Excerpt from the 2022-23 Operational Budget Development Staff Addition/Reduction Request form states:

Complete all yellow highlighted fields including justification section. Estimate costs and briefly describe needs in each category requiring funding. Refer to the average salary and health insurance guides for budgeted amounts to use when requesting a new position. Align justification with budget goals or priority steps where possible.

The form gives detailed instructions for completion, but makes linking to the strategic plan optional. The form includes an area for “justification” without reference to strategic plan goals or priorities. Such requirement will clearly align the request to an approved strategic goal/priority. Lack of such visible and consistent documentation fails to link budgets and expenditures of district resources to NPS strategic priorities and goals.

The National Center for Educational Statistics reiterates the importance of a link between an organization’s budget and achievement of its goals and states:

The link between financial planning and budget preparation gives the budget document a unique role in governmental organizations. Budgets in the public arena are often considered the definitive policy document because an adopted budget represents the financial plan used by a government to achieve its goals and objectives. When a unit of government legally adopts a financial plan, the budget has secured the approval of the majority of the governing board and reflects:

- public choices about which goods and services the unit of government will or will not provide,
- the prioritization of activities in which the unit of government will be involved,
- the relative influence of various participants and interest groups in the budget development process, and
- the governmental unit’s plan for acquiring and using its resources.

RECOMMENDATION

Recommendation 2-6:

Ensure NPS budget documents reflect alignment to its Strategic Plan.

Priorities in NPS Strategic Plan should drive the District’s budget development process. The NPS budget and budget preparation documents should require the linkage with its overall
strategic plan. Such linkage will provide guidance for the allocation of resources to priorities and clearly communicate direction across NPS.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING**

NPS website does not consistently reflect the NPS mission, current goals, and strategic priorities. District’s current mission, vision, and equity are published in several places including the NPS website under Community Relations section number 0000, entitled *Mission and Functions*.

The School Board Policy 0220 entitled *Goals/Objectives/Strategies for Norwalk Public Schools*, currently on the District’s website, references closing the “Achievement Gap by 2020” and does not reflect the current goals and strategies.

The NPS Board of Education Mission, posted in the Board section of the district website is

*To create a student-focused culture that motivates, challenges and supports every individual student to his or her highest levels of achievement.*

NPS website section “About” references the same mission; however, the current mission of NPS is:

*Norwalk Public Schools provides an excellent and equitable education so ALL students graduate future ready as civically responsible, globally engaged and positive contributors to an ever-changing and diverse world.*

The NPS Board of Education approved its current Strategic Plan, *Future For All*, in July 2021. This plan includes updated strategic components such mission, vision, values, goals, and strategic priorities. **Exhibit 2-24** shows NPS Board Policy 0220 entitled *Goals/Objectives/Strategies for Norwalk Public Schools*, last reviewed in 2014, and not reflective of NPS current strategic initiatives.
Exhibit 2-24
NPS Board Policy 0220
July 1, 2021

Book Policy Manual, Section 0000 - Mission-Goals-Objectives

Title Goals/Objectives/Strategies for Norwalk Public Schools, Code 0220, Status Active


GOALS/OBJECTIVES/STRATEGIES FOR NORWALK PUBLIC SCHOOLS

Primary Goal:
To close the Achievement Gap by 2020 and assure that all students, regardless of race, ethnicity, or economic circumstances, are meeting high standards.

Additional Goals:
- All children are ready to enter Kindergarten.
- All students are “on track” to meet or exceed learning expectations by the end of Grade 3.
- Students are at or above grade level in 3rd Grade reading.
- Students demonstrate Mastery in CCSS Mathematics.
- Students demonstrate Mastery in CCSS English Language Arts.
- English Language Learners (ELL) students meet or exceed State Annual Measurable Achievement Objectives.
- Special Education students achieve Mastery on their annual individual goals and objectives.
- Norwalk’s schools reach higher performance.
- Norwalk students graduate from high school “College and Career Ready.”

The Board will periodically weigh evidence to measure progress towards reaching these goals.

Strategies:
To realize our mission, vision, and values, and to strive for the goals we have set for our students and our schools, Norwalk Public Schools will implement strategic plans that include the following focus areas and priorities:
- Create a culture of accountability where high expectations and standards drive our behavior and actions.
- Build the knowledge, skills and capacity of teachers, staff, and school leaders through a cycle of continuous improvement.
- Improve or transform the learning environment for all students.
- Provide the systems, structures, and tools necessary to support a world-class learning environment.
- Create a PreK through College and Career mindset for students and parents.
- Enhance Special Education programs and implement effective quality control and decision-making.
- Collaborate with partners and engage parents/guardians with a community-wide effort to support our mission.

Source: NPS Website, January 2022.
The lack of current strategic plan components visibly reflected on the District’s website is confusing to readers, especially the general public, and does not reflect the current direction of NPS. A reference for NPS is Stamford Public Schools which clearly shows its Strategic Plan on its website.

RECOMMENDATION

Recommendation 2-7:

Ensure the current NPS Strategic Plan is reflected on its website.

In February 2022, NPS posted the strategic plan on the website at https://norwalkps.org/npsstrategicplan and provides a mid-year update (draft form) showing progress toward each goal at https://sites.google.com/norwalkps.org/21-26-strategic-plan-portfolio/home..

FISCAL IMPACT

This recommendation can be implemented with existing resources.

2.6 Policies and Procedures

The development of policies and procedures constitutes the means by which a school district can communicate expectations. In addition, adopting policies and establishing related procedures provide the mechanism for:

- establishing the school board’s expectations;
- establishing what may be expected from the school board;
- establishing an essential division between policy-making and administrative roles;
- creating guidelines within which personnel operate;
- providing reasonable assurances of consistency and continuity in decisions;
- providing the basis for the allocation of funds, facilities, and other resources;
- facilitating and guiding the orientation of the board members and employees; and
- acquainting the public with and encouraging citizen involvement within structured guidelines.

Board policies communicate what things are to be done, and administrative procedures communicate how things are to be done. Policy and procedures, therefore, reveal the philosophy and position of the School Board and state clearly enough to provide for executive or staff direction.
In the past NPS has contracted for review of all of its policies and procedures. Exhibit 2-25 provides the Table of Contents for the Board’s current policies.

**Exhibit 2-25**

**NPS Board Policies**

**Table of Contents**

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>0.00</td>
<td>Mission – Goals - Objectives</td>
</tr>
<tr>
<td>1.00</td>
<td>Community Relations</td>
</tr>
<tr>
<td>2.00</td>
<td>Administration</td>
</tr>
<tr>
<td>3.00</td>
<td>Business and Non-Instructional Operations</td>
</tr>
<tr>
<td>4.00</td>
<td>Personnel</td>
</tr>
<tr>
<td>5.00</td>
<td>Students</td>
</tr>
<tr>
<td>6.00</td>
<td>Instruction</td>
</tr>
<tr>
<td>7.00</td>
<td>Facilities</td>
</tr>
<tr>
<td>8.00</td>
<td>Left Blank on NPS Website</td>
</tr>
<tr>
<td>9.00</td>
<td>Bylaws of the Board</td>
</tr>
</tbody>
</table>

*Source: NPS Board Policies, 2021.*

**FINDING**

NPS has no comprehensive procedures (or regulations) manual—electronically or in print form. NPS is in transition to a new software platform. Some procedures stand alone in the directory, and some are combined with policies. NPS has recently reorganized and experienced substantial turnover. Certain areas such as Purchasing and the Superintendent's Office have started to develop procedures for their respective areas to help with training and consistency of operations. In addition, Human Resources has developed administrative procedures (regulations) outlining processes such as Medicare reporting, observations reporting, and quarantine inquiries.

NPS Board Policy 2231 entitled *Policy Manual* sets forth the responsibilities and form of regulations and procedures collectively designated at regulations. Exhibit 2-26 shows Board Policy 2231 outlining NPS policy and regulation system.
Exhibit 2-26
NPS Board Policy 2231 Policy Manual
Last Reviewed May 16, 1995

Status Active, Adopted August 29, 1985, Last Reviewed May 16, 1995

Policy and Regulation System

POLICY MANUAL

Policy Manual
The Superintendent shall establish and maintain an orderly plan for preserving and making accessible the policies adopted by the Board, the bylaws adopted by the Board, and the regulations of the administration. The Board policies, the Board bylaws, and the administrative regulations shall be published in a manual, maintained in current condition, and made available to all persons concerned.

Policies
Policies are statements of intent which are adopted by the Board of Education. They serve as guides to the administration in development and implementation of regulations for operating the school system.

The superintendent must take the leadership in the policy-making process, by recognizing the need for specific policies and giving the Board proposed policy statements for consideration, modification, and adoption. The Superintendent shall develop a regulation specifying the procedures by which policies will be developed and presented to the Board.

Regulations
The Superintendent shall specify the required actions and design the detailed arrangements under which the schools are to be operated. Those regulations and procedures which apply throughout the school system are to be designated as “regulations” and are to be placed in the school system policies and regulations manual. The regulations shall be presented to the Board before implementation in the school system, but the Board will not adopt a regulation unless requested to do so by the Superintendent or unless adoption is required by federal or state law. Administrative regulations must be consistent with the policies adopted by the Board of Education.

The Superintendent is responsible for development and implementation of the school system regulations. As a matter of good administrative procedure, the Superintendent should develop a system whereby staff members are involved in development of regulations in order to make certain that each regulation is complete, efficient, sufficient to the need, consistent with adopted Board policy, and capable of full implementation.

Bylaws
Bylaws are the rules governing the internal operations of the Board of Education. When need for a new bylaw, or modification of an existing bylaw is recognized, the Superintendent will be directed to develop and present to the Board an effective new or modified bylaw for consideration, modification if necessary, and adoption. The same procedure used for development of policies shall be used for development of bylaws.

Source: NPS Website, December 2021

As a result of changes, such as organizational structure and legislative revisions, the need for a regulations manual is amplified. The Connecticut Association of Boards of Education (CABE) recommends that regulations are routinely updated and “all administrative regulations be contained in the Board’s policy manual, following the policy to which the regulation refers”.

RECOMMENDATION

Recommendation 2-8:

Develop a comprehensive Administrative Regulations Manual.
As stated in the introductory section of CABE’s 2017 Audit Report, the regulations or procedures are generally included behind the relative policy. The District regulations should specify the required actions and detailed arrangements under which NPS is to be operated.

The District should follow its School Board Policy 2231 which states:

As a matter of good administrative procedure, the Superintendent should develop a system whereby staff members are involved in development of regulations in order to make certain that each regulation is complete, efficient, sufficient to the need, consistent with adopted Board policy, and capable of full implementation.

For example, NPS School Board Policy 3541 entitled Transportation and supporting Regulation 3541-R entitled Transportation: Routes and Services Regulation).

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

NPS policies are not consistently reviewed. Districtwide overall policy revision was last performed by CABE, Connecticut Association of Boards of Education, in October 2017. NPS has, subsequently, been working on a gradual phase in of policy revisions, especially relative to immediate critical needs. The focus thus far has been on adopting policies required by law, policies for the District's reorganization, and policies for day-to-day operations. Several policies reflect a review date of prior to the 2017 CABE review. While they might have been reviewed, NPS records do not indicate such. Outdated policies create a lack of confidence and create the potential for confusion about operations and expectations.

The Connecticut Association of Board of Education (CABE) provides policy services to Connecticut school districts and recommends the Board “give attention to policy issues to either adopt new policies or to revise existing ones”.

Upon Evergreen request, NPS staff provided an update to policy changes subsequent to the 2017 CABE review. Exhibit 2-27 shows policy changes with their new dates.
## Exhibit 2-27
### NPS Schedule of Policies
**Updated October 2015 – October 2021**

<table>
<thead>
<tr>
<th>Date</th>
<th>Policy</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>October 2015</td>
<td>Policy 6141.328</td>
<td>Bring Your Own Device</td>
</tr>
<tr>
<td></td>
<td>Policy 5125</td>
<td>Student Records</td>
</tr>
<tr>
<td>April 2016</td>
<td>Bylaw 9010</td>
<td>Limits of Authority</td>
</tr>
<tr>
<td></td>
<td>Policy 1211</td>
<td>School Governance Councils</td>
</tr>
<tr>
<td>May 2016</td>
<td>Policy 5113</td>
<td>Attendance</td>
</tr>
<tr>
<td>August 2016</td>
<td>Policy 5118</td>
<td>Non-Resident Attendance</td>
</tr>
<tr>
<td>December 2016</td>
<td>Bylaw 9323</td>
<td>Electronic Attendance at Board Meetings</td>
</tr>
<tr>
<td>February 2017</td>
<td>Policy 6142.101</td>
<td>Student Nutrition Physical Activity (Wellness)</td>
</tr>
<tr>
<td>May 2017</td>
<td>Policy 1326</td>
<td>Exterior Signage</td>
</tr>
<tr>
<td>August 2017</td>
<td>Policy Reg 3541</td>
<td>Transportation Routes and Services</td>
</tr>
<tr>
<td>March 2018</td>
<td>Policy 5145.512</td>
<td>Title IX Sexual Harassment</td>
</tr>
<tr>
<td>April 2018</td>
<td>Policy 5123.11</td>
<td>Grades 4 &amp; 5 Criteria Summer Academy</td>
</tr>
<tr>
<td>May 2018</td>
<td>Policy 3524.1</td>
<td>Pesticide Application</td>
</tr>
<tr>
<td></td>
<td>Policy 3542.22</td>
<td>Food Service Code of Conduct</td>
</tr>
<tr>
<td></td>
<td>Policy 4112.52</td>
<td>Criminal History Record Info</td>
</tr>
<tr>
<td></td>
<td>Policy 5118.1</td>
<td>Homeless</td>
</tr>
<tr>
<td></td>
<td>Policy 5145.4</td>
<td>Nondiscrimination</td>
</tr>
<tr>
<td></td>
<td>Policy 5145.511</td>
<td>Sexual Abuse Prevention</td>
</tr>
<tr>
<td></td>
<td>Policy 6141.312</td>
<td>Migrant Students</td>
</tr>
<tr>
<td></td>
<td>Policy 6141.323</td>
<td>Internet Use; Filtering</td>
</tr>
<tr>
<td></td>
<td>Policy 6161.3</td>
<td>Comparability of Services</td>
</tr>
<tr>
<td>June 2018</td>
<td>Policy 4212.42</td>
<td>Drug &amp; Alcohol Testing Bus Drivers</td>
</tr>
<tr>
<td></td>
<td>Policy 5131.7</td>
<td>Weapons &amp; Dangerous Instruments</td>
</tr>
<tr>
<td></td>
<td>Policy 5144.1</td>
<td>Physical Restraint &amp; Seclusion</td>
</tr>
<tr>
<td></td>
<td>Policy 6171.2</td>
<td>Preschool Students w/Disabilities</td>
</tr>
<tr>
<td>August 2018</td>
<td>Policy 5131.6</td>
<td>Drugs, Alcohol &amp; Tobacco</td>
</tr>
<tr>
<td></td>
<td>Policy 5125.11</td>
<td>Health/Medical Records</td>
</tr>
<tr>
<td></td>
<td>Policy 5141.21</td>
<td>Administration of Medication</td>
</tr>
<tr>
<td></td>
<td>Policy 5144.4</td>
<td>Physical Exercise</td>
</tr>
<tr>
<td>March 2019</td>
<td>Policy 6146</td>
<td>GPA Rank</td>
</tr>
<tr>
<td>April 2019</td>
<td>Policy 6146.1</td>
<td>PTECH Graduation Requirements</td>
</tr>
<tr>
<td>May 2019</td>
<td>Policy 4112.6</td>
<td>Personnel Records</td>
</tr>
<tr>
<td></td>
<td>Policy 4115</td>
<td>Evaluation Certified Personnel</td>
</tr>
<tr>
<td></td>
<td>Policy 4131</td>
<td>Staff Development</td>
</tr>
<tr>
<td></td>
<td>Policy 5123.11</td>
<td>Updated Summer Academy</td>
</tr>
<tr>
<td>June 2019</td>
<td>Policy 1111.1</td>
<td>Community Relations/School Directories</td>
</tr>
<tr>
<td></td>
<td>Policy 1250</td>
<td>Visits to the Schools</td>
</tr>
<tr>
<td></td>
<td>Policy 1330</td>
<td>Use of School Facilities – Buildings</td>
</tr>
<tr>
<td></td>
<td>Policy 1412</td>
<td>Fire Department</td>
</tr>
<tr>
<td>October 2019</td>
<td>Policy 3516</td>
<td>Safe and Secure School Facilities, Equipment, and Grounds</td>
</tr>
<tr>
<td></td>
<td>Policy 4111.3</td>
<td>Minority Recruitment</td>
</tr>
<tr>
<td>June 2020</td>
<td>Policy 6172.6</td>
<td>Emergency Closure Remote Learning</td>
</tr>
<tr>
<td>July 2020</td>
<td>Policy 6114.81</td>
<td>Emergency Suspension of Policy during Pandemic</td>
</tr>
<tr>
<td>October 2020</td>
<td>Policy 4000.1/5145.44</td>
<td>New Title IX Sexual Discrimination</td>
</tr>
<tr>
<td>February 2021</td>
<td>Policy 4114</td>
<td>Social Media</td>
</tr>
<tr>
<td>October 2021</td>
<td>Policy 0000</td>
<td>Statement of Mission, Vision and Equity</td>
</tr>
</tbody>
</table>

*Source: Superintendent’s Office, January 2022.*
COMMENDATION

The Superintendent’s Office staff has documented policy updates.

RECOMMENDATION

Recommendation 2-9:

Continue to review and document policy revisions.

NPS has taken steps to update its policies in accordance with State requirements and CABE recommendations. The District’s internally available policies, public website, and policies presented to Evergreen show dates reviewed as far back as 1995, although the 2017 Connecticut Association of Boards of Education, CABE, policy review states their “report represents a review of all existing Norwalk Public Schools policies, administrative regulations, and Board of Education bylaws contained in the District’s current policy manual”. The District should update its policies and documentation of policies to reflect the most recent dates of revisions, reviews, or newly adopted policies.

FISCAL IMPACT

This recommendation can be implemented with existing resources.
CHAPTER 3:
FINANCIAL MANAGEMENT
3.0 FINANCIAL MANAGEMENT

Municipal school districts must practice sound financial management in order to maximize the effectiveness of limited resources and to plan for future needs. Effective financial management ensures that internal controls are in place and operating as intended, technology is maximized to increase productivity, and reports are generated that help management reach its goals.

For purposes of this study, Financial Management includes the broad areas of:

3.1 Financial Management and Accounting
3.2 Grants Management
3.3 Asset and Risk Management
3.4 Management and Budget
3.5 Purchasing and Accounts Payable
3.6 Policies and Procedures

The areas of External and Internal Audit and Investments would also be included in this section; however, Norwalk Public Schools does not have a separate audit function or investment program from the City of Norwalk.

The NPS mission is to create a student-focused culture that motivates, challenges, and supports each individual student to his or her highest levels of achievement. There are over 1,900 dedicated professionals working closely with more than 11,700 students in 21 schools. Norwalk Public Schools is made up of one inclusive pre-school, 12 elementary schools, four middle schools, and four high schools, the four high schools include two comprehensive high schools and two specialty high schools (Center for Global Studies, an inter-district high school magnet program, and P-TECH Norwalk—a collaboration between NPS, Norwalk Community College and IBM). The District’s rich diversity is a key part of its strength.

Exhibit 3-1 provides a peer comparison of Operating Budgets and the Percentage of Local Funding for FY 21.

### Exhibit 3-1
Operating Budget and Percentage of Local Funding
FY 2021

<table>
<thead>
<tr>
<th>School District</th>
<th>Operating Budget</th>
<th>Local Funds (Property Taxes)</th>
<th>Percentage of Total Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk</td>
<td>$208,468,385</td>
<td>$177,198,127</td>
<td>85.0%</td>
</tr>
<tr>
<td>Stamford</td>
<td>$285,555,203</td>
<td>$248,433,027</td>
<td>87.0%</td>
</tr>
<tr>
<td>Fairfield</td>
<td>$188,758,852</td>
<td>$179,320,909</td>
<td>95.0%</td>
</tr>
<tr>
<td>Westport</td>
<td>$121,936,487</td>
<td>$120,717,122</td>
<td>99.0%</td>
</tr>
<tr>
<td>White Plains</td>
<td>$233,244,050</td>
<td>$194,838,558</td>
<td>83.5%</td>
</tr>
</tbody>
</table>

From a financial and budget view, NPS appears in the City of Norwalk’s budget as a department labeled Education much like the Police, Fire, and Community Services departments appear. NPS typically carries 50 percent or more of the grand total for expenditures of the City. NPS has its own Finance Division and governing Board of Education (BOE) that determines and guides them on how their appropriation from the City is spent each year.

3.1 **FINANCIAL MANAGEMENT AND ACCOUNTING**

The Chief Executive Officer of the Schools is the Superintendent, appointed for an indefinite term by the Board of Education. The Chief Financial Officer (CFO) is hired by the Superintendent and has supervision over the Finance Department. He and his staff are responsible for the administration of the financial affairs of NPS.

**Exhibit 3-2** provides a functional presentation of the Finance Department.

**Exhibit 3-3** shows NPS expenditures.

---

**Exhibit 3-2**

**Finance Department**

**2021-22 Fiscal Year**

- **Chief Finance Officer**
- **Finance Assistant**
- **Purchasing Coordinator**
- **Budget Director**
- **Payroll Supervisor**
  - **Payroll Clerk**
  - **Payroll/Benefits Specialist (PT)**
- **Purchasing Representative**
- **Budget Lead—Employee Management**
- **Budget Lead—Grants Management**
- **Budget Lead—SPED & Central Office**

*Source: Norwalk Public Schools, Chief Financial Officer, December 2021.*
Exhibit 3-3
Budget to Actual Summary of Expenses
September 2021

<table>
<thead>
<tr>
<th>Object</th>
<th>Original Budget</th>
<th>Adjusted Budget</th>
<th>% Of Operating</th>
<th>Variance $</th>
<th>Variance %</th>
<th>Monthly Actuals</th>
<th>YTD Actuals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Salaries (100)</td>
<td>$128,188,410</td>
<td>$129,697,619</td>
<td>$61.12%</td>
<td>$1,509,210</td>
<td>$1.18%</td>
<td>$9,909,231</td>
<td>$17,021,295</td>
</tr>
<tr>
<td>Benefits (200)</td>
<td>37,128,026</td>
<td>35,906,557</td>
<td>16.92%</td>
<td>-1,221,469</td>
<td>-3.29%</td>
<td>325,500</td>
<td>756,701</td>
</tr>
<tr>
<td>Professional &amp; Technical Services (300)</td>
<td>7,127,817</td>
<td>7,308,696</td>
<td>3.44%</td>
<td>180,879</td>
<td>2.54%</td>
<td>288,484</td>
<td>738,071</td>
</tr>
<tr>
<td>Property Services (400)</td>
<td>7,009,491</td>
<td>7,061,703</td>
<td>3.33%</td>
<td>52,212</td>
<td>0.74%</td>
<td>1,208,031</td>
<td>2,027,143</td>
</tr>
<tr>
<td>Other Services (500)</td>
<td>18,575,051</td>
<td>18,342,775</td>
<td>8.64%</td>
<td>-232,276</td>
<td>-1.25%</td>
<td>297,591</td>
<td>607,055</td>
</tr>
<tr>
<td>Supplies and Materials (600)</td>
<td>7,857,299</td>
<td>10,356,108</td>
<td>4.88%</td>
<td>2,498,809</td>
<td>31.80%</td>
<td>947,216</td>
<td>1,524,397</td>
</tr>
<tr>
<td>Equipment (700)</td>
<td>2,336,110</td>
<td>3,272,956</td>
<td>1.54%</td>
<td>936,846</td>
<td>40.10%</td>
<td>387,257</td>
<td>923,153</td>
</tr>
<tr>
<td>Other Objects (800)</td>
<td>246,181</td>
<td>242,418</td>
<td>0.11%</td>
<td>-3,763</td>
<td>-1.53%</td>
<td>7,746</td>
<td>85,436</td>
</tr>
<tr>
<td>Others</td>
<td>0</td>
<td>0</td>
<td>0 %</td>
<td>0</td>
<td>0 %</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>$208,468,385</strong></td>
<td><strong>$212,188,834</strong></td>
<td><strong>100%</strong></td>
<td><strong>$3,720,449</strong></td>
<td><strong>1.78%</strong></td>
<td><strong>$13,371,055</strong></td>
<td><strong>$23,683,251</strong></td>
</tr>
</tbody>
</table>

Source: Norwalk Public Schools, Budget Director, November 2021.

There are many functions shared between the City of Norwalk and NPS including Risk Management, Information Technology, and Facilities and Maintenance. The MUNIS software system utilized for applications such as General Ledger, Accounts Payable, Requisitions, Purchasing, Budgeting and Position Control, Human Resources, and Payroll is also shared. MUNIS is maintained by the City. Additionally, the Novatime Technology Time and Attendance system (Novatime) is an electronic time and attendance system used to record employee time and sick and vacation accruals (including usage and balances) and it is utilized by both the City and the NPS. The data from Novatime are imported into the MUNIS PaySystem.

**FINDING**

NPS undertook an assessment of the MUNIS system functions to see where improvements could be made. The purpose of the assessment was to understand current processes, how MUNIS is currently used, and identify where MUNIS suites can be optimized to increase benefits for Norwalk Public Schools. The outcome was the recommendations to utilize the system more fully, establish separate roles and security permissions between the City and the NPS, and provide the necessary training for implementations to be made.

There was no immediate plan to address the recommendations in the assessment; however, since Evergreen met with City and NPS staff during the study, a joint committee has been formed to review and implement the recommendations during the MUNIS conversion scheduled for September 2022. MUNIS is a shared system; therefore, this collaboration is needed in order for meaningful changes to be made.

**Exhibit 3-4** shows key recommendations of the assessment.
### Exhibit 3-4

**MUNIS Assessment Findings and Recommendations**  
**August 2021**

<table>
<thead>
<tr>
<th>Description</th>
<th>Observation</th>
<th>Recommendation</th>
<th>Benefits</th>
<th>Implementation</th>
</tr>
</thead>
<tbody>
<tr>
<td>System Upgrade</td>
<td>Currently on version 11.3.25.0</td>
<td>Upgrade to MUNIS HUB</td>
<td>Efficiency and Effectiveness</td>
<td>HUB training</td>
</tr>
<tr>
<td>Role Based Security</td>
<td>City maintains roles &amp; permissions</td>
<td>Set up as separate functional and data access roles</td>
<td>Roles attach to individuals decreasing level of maintenance requirement</td>
<td>Review roles, permissions rules</td>
</tr>
<tr>
<td>Interaction with Tyler</td>
<td>Users not utilizing available MUNIS tools</td>
<td>Utilize functionality in the desktop</td>
<td>Training tools and knowledge maintenance</td>
<td>Gain access</td>
</tr>
<tr>
<td>MUNIS Cubes</td>
<td>Using MUNIS canned reports and excel spreadsheets</td>
<td>Use for reporting needs</td>
<td>Wide range of custom reports</td>
<td>Cubes training</td>
</tr>
<tr>
<td>Workflow</td>
<td>Used mainly for requisitions</td>
<td>Use in any capacity where there is a current paper process for approvals</td>
<td>All transactions can be approved electronically</td>
<td>Business rule setup and review</td>
</tr>
<tr>
<td>General Ledger-</td>
<td>Option is available to auto generate Due to/Due from entries</td>
<td>Turn this option on to eliminate one less click in creating journal entries</td>
<td>Eliminates the risk of failing to post DT/DF entries crossing funds</td>
<td>Turn on option</td>
</tr>
<tr>
<td>DT/DF</td>
<td>Status is currently set to “Approved”</td>
<td>Update status to “None-Workflow”</td>
<td>Will allow for electronic approval of journal entries</td>
<td></td>
</tr>
<tr>
<td>General Ledger-</td>
<td>Purchasing Settings-</td>
<td>Requisition setting is currently “No Workflow”</td>
<td>Streamlines process with automatic PO creation</td>
<td></td>
</tr>
<tr>
<td>Default Journal Status</td>
<td>Conversion</td>
<td>Use to “No Workflow-allow final approver to convert to PO/Contract”</td>
<td>Turn on option</td>
<td></td>
</tr>
<tr>
<td>Purchasing Settings-</td>
<td>Not currently utilizing this process</td>
<td>Use option to auto post Pos</td>
<td>Eliminate the posting of PO batches</td>
<td>Turn on option</td>
</tr>
<tr>
<td>“Allow auto posting of purchase orders”</td>
<td></td>
<td>Use option to print hard copies and also email vendors</td>
<td>Streamline process with auto printing and emailing</td>
<td></td>
</tr>
<tr>
<td>Accounts Payable-</td>
<td>Currently all invoices are sent to the City for entry in MUNIS</td>
<td>NPS enter invoices and release to approval process</td>
<td>All documentation will reside in MUNIS and can be viewed by those required to</td>
<td>Training</td>
</tr>
<tr>
<td>Electronic Approval</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Accounts Payable-</td>
<td>Not currently utilizing this process</td>
<td>Use this process for expenses not requiring a PO</td>
<td>Check request can be converted to an invoice after approved</td>
<td>Setup and Training</td>
</tr>
<tr>
<td>Request for Check</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Budget Entry</td>
<td>Spreadsheets are used to complete non-wage budget requests then entered in MUNIS</td>
<td>Allow departments to enter their requests in MUNIS using Next Year Budget Entry or Central Budget Entry</td>
<td>Eliminate duplicate entry and streamline process</td>
<td>Training</td>
</tr>
<tr>
<td>General Ledger-</td>
<td>Using “General Journal Entry/Proof” to review and post GEN journal entries</td>
<td>Use the “Accounting Entries” program</td>
<td>Efficient browsing for unposted journals and simplified journal entry screen</td>
<td>Turn on option</td>
</tr>
<tr>
<td>Accounting Entries</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Central Programs</td>
<td>MUNIS users are unaware/unfamiliar with Central programs</td>
<td>Utilize these data inquiry tools</td>
<td>Streamlines inquiry process and data search</td>
<td>Training</td>
</tr>
</tbody>
</table>

*Source: Tyler Technologies Investment Assessment, August 2021.*
RECOMMENDATION

Recommendation 3-1:

Develop a plan to fully implement the MUNIS assessment and recommendations that can be done immediately, and provide the analysis and/or training sessions associated with the recommendations being implemented.

This should be a collaborative effort with the City of Norwalk since MUNIS is a shared resource. As noted, NPS and the City have established a cross functional team and have begun working on the implementation time line for the overall MUNIS upgrade. A tentative go live date of September, 2022 has been set and will include modules for Finance, Payroll, and HR. The actual upgrade is from V2019.1 to V2021. Options for training before going live are being discussed with the software provider. Members of the team are listed here:

<table>
<thead>
<tr>
<th>CITY TEAM</th>
<th>NPS TEAM</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Larry Manzi</td>
<td>1. Lunda Asmani</td>
</tr>
<tr>
<td>2. Henry Dachowitz</td>
<td>2. Kristin Karczmit</td>
</tr>
<tr>
<td>3. Chitsamay Lam</td>
<td>3. Nina Laria</td>
</tr>
<tr>
<td>4. Joyce Liu</td>
<td>4. Lisette Colon</td>
</tr>
<tr>
<td>5. Lisa Biagiarelli</td>
<td></td>
</tr>
<tr>
<td>6. William Ford</td>
<td></td>
</tr>
</tbody>
</table>

Several of the recommendations only require access to existing tools or turning on existing options including the following:

- MUNIS Tools-Knowledgebase, Community, Tyler U and Tyler Search
- MUNIS Cubes-wide range of custom reports
- Auto generate Due To/Due From entries in Journal Entry
- Default Journal Status to “None-Workflow”
- Next Year or Central Budget Entry
- Accounting Entries program
- Central Programs-Inquiry tools

FISCAL IMPACT

The recommendations in the MUNIS assessment report do not require the purchase of additional suites or upgrades, but analysis and training days will be needed. The assessment suggested a total of four days of training for the above programs. At an average cost of $400 per day, the total would be $1,600. The greater efficiencies and effectiveness from the MUNIS software and ancillary programs should offset any training costs.
3.2 **GRANTS MANAGEMENT**

Departments must receive Common Council approval to apply for individual state and federal grants. When these grants are awarded, they are signed and approved by the Common Council and the Mayor. Once approved and awarded, the Grant accountant for the NPS tracks expenditures, employees, and revenue for the grant in an Excel spreadsheet. The reporting requirements and drawdown requests and other grant monitoring activities are prepared and performed by the Grant writer.

**FINDING**

Prior to July 2021, there was no grants management process outside of listing the awards and amounts for reporting purposes. A newly hired Grants Accountant has built the current process and provided simplified guidelines to department heads informing them of funds available and any designated uses for the funds. Budgets had not been created for the grants in the past and the level of cost tracking was minimal. An excel spreadsheet is currently utilized to perform these tasks on a monthly basis.

**Exhibit 3-5** shows total grant amounts awarded for the last three years, and for FY 2022 through December 2021.
### Exhibit 3-5

**NPS Grants Award Amounts**

2018-19 to 2021-22 Year to Date

<table>
<thead>
<tr>
<th>Grantor</th>
<th>2018-19</th>
<th>2019-20</th>
<th>2020-21</th>
<th>2021-22 YTD</th>
<th>Grand Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adult Education - Cooperative</td>
<td>$52,976</td>
<td>$54,850</td>
<td>$36,265</td>
<td>$144,091</td>
<td></td>
</tr>
<tr>
<td>Adult Education - Provider</td>
<td>$82,402</td>
<td></td>
<td></td>
<td></td>
<td>$82,402</td>
</tr>
<tr>
<td>Bilingual Education</td>
<td>$124,882</td>
<td>$118,237</td>
<td>$125,037</td>
<td>$368,156</td>
<td></td>
</tr>
<tr>
<td>Child Nutrition State Matching Grant</td>
<td>$53,901</td>
<td>$54,143</td>
<td>$55,789</td>
<td>$163,833</td>
<td></td>
</tr>
<tr>
<td>CV Relief Funds</td>
<td>$4,950,337</td>
<td></td>
<td></td>
<td>$463,873</td>
<td>$5,414,209</td>
</tr>
<tr>
<td>ECS Alliance District</td>
<td>$1,344,234</td>
<td>$1,887,399</td>
<td>$2,495,348</td>
<td>$939,818</td>
<td>$6,666,799</td>
</tr>
<tr>
<td>Education Equalization</td>
<td>$9,848,873</td>
<td>$9,751,068</td>
<td>$10,105,571</td>
<td>$2,321,880</td>
<td>$32,027,392</td>
</tr>
<tr>
<td>Emergency Impact Aid for Displaced Students</td>
<td>$65,000</td>
<td></td>
<td></td>
<td></td>
<td>$65,000</td>
</tr>
<tr>
<td>Emergency Operating Costs Reimbursement (PEBT)</td>
<td></td>
<td></td>
<td></td>
<td>$17,178</td>
<td>$17,178</td>
</tr>
<tr>
<td>Extended School Hours</td>
<td>$200,817</td>
<td>$206,860</td>
<td>$207,013</td>
<td>$614,690</td>
<td></td>
</tr>
<tr>
<td>Family Resource Center Prgm.</td>
<td>$100,000</td>
<td>$101,530</td>
<td>$101,530</td>
<td>$336,516</td>
<td></td>
</tr>
<tr>
<td>First Robotics Competitive Mini-Grant Program</td>
<td>$5,600</td>
<td></td>
<td></td>
<td>$11,200</td>
<td></td>
</tr>
<tr>
<td>Fresh Fruit and Veg</td>
<td>$28,717</td>
<td>$32,216</td>
<td>$60,933</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Health Foods Initiative</td>
<td>$102,699</td>
<td>$103,143</td>
<td>$103,111</td>
<td>$308,953</td>
<td></td>
</tr>
<tr>
<td>IDEA- Part B- Section 611</td>
<td>$85,962</td>
<td>$68,570</td>
<td>$80,393</td>
<td>$243,665</td>
<td></td>
</tr>
<tr>
<td>IDEA- Part B- Section 619</td>
<td>$1,066,168</td>
<td>$1,932,404</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Immigrant &amp; Youth Education Program</td>
<td>$60,385</td>
<td>$40,000</td>
<td>$43,836</td>
<td>$144,221</td>
<td></td>
</tr>
<tr>
<td>Magnet School Operating</td>
<td>$1,341,880</td>
<td>$1,343,493</td>
<td>$213,918</td>
<td>$5,012,258</td>
<td></td>
</tr>
<tr>
<td>Magnet School-Transportation</td>
<td>$241,347</td>
<td>$263,900</td>
<td>$213,918</td>
<td>$830,022</td>
<td></td>
</tr>
<tr>
<td>National School Lunch</td>
<td>$2,874,297</td>
<td>$2,510,505</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>National School Lunch - Cares Act</td>
<td>$41,924</td>
<td>$48,106</td>
<td>$52,298</td>
<td>$200,606</td>
<td></td>
</tr>
<tr>
<td>Nonpublic Health Services</td>
<td>$361,131</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NSL Emergency Operating Costs Reimbursement</td>
<td>$551,644</td>
<td>$534,036</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Quality Enhancement Grant Program</td>
<td>$37,688</td>
<td>$37,688</td>
<td>$37,688</td>
<td></td>
<td>$113,064</td>
</tr>
<tr>
<td>Sch. Construction-Progress</td>
<td>$361,131</td>
<td></td>
<td></td>
<td></td>
<td>$361,131</td>
</tr>
<tr>
<td>School Accountability - Summer School</td>
<td>$238,002</td>
<td>$239,997</td>
<td>$249,030</td>
<td>$727,029</td>
<td></td>
</tr>
<tr>
<td>School Breakfast Program</td>
<td>$551,644</td>
<td>$534,036</td>
<td>$311,447</td>
<td>$1,361,232</td>
<td></td>
</tr>
<tr>
<td>School Readiness and Child Day Care Grant Program</td>
<td>$5,366,943</td>
<td>$5,380,445</td>
<td>$2,032,034</td>
<td>$17,403,385</td>
<td></td>
</tr>
<tr>
<td>Spec Ed-Ag Placements &amp; Excess Cost</td>
<td>$4,274,616</td>
<td>$3,209,450</td>
<td>$3,148,752</td>
<td>$10,632,818</td>
<td></td>
</tr>
<tr>
<td>State School Breakfast</td>
<td>$55,059</td>
<td>$54,474</td>
<td>$51,596</td>
<td>$161,129</td>
<td></td>
</tr>
<tr>
<td>Student Support and Academic Enrichment Grant</td>
<td>$110,000</td>
<td>$85,143</td>
<td>$233,883</td>
<td>$452,177</td>
<td></td>
</tr>
<tr>
<td>Summer Food Service Program - Admin</td>
<td>$15,147</td>
<td>$48,552</td>
<td>$45,426</td>
<td>$667,705</td>
<td></td>
</tr>
<tr>
<td>Summer Food Service Program - Opr</td>
<td>$381,920</td>
<td>$1,869,070</td>
<td>$1,869,070</td>
<td>$2,250,990</td>
<td></td>
</tr>
<tr>
<td>Summer Food Service Program - Opr</td>
<td>$180,481</td>
<td>$195,353</td>
<td>$3,542,803</td>
<td>$1,748,738</td>
<td>$5,667,375</td>
</tr>
<tr>
<td>Talent Development - TEAM</td>
<td>$35,909</td>
<td>$33,561</td>
<td>$26,025</td>
<td>$95,495</td>
<td></td>
</tr>
<tr>
<td>Title I Improving Basic Programs</td>
<td>$2,423,763</td>
<td>$2,211,098</td>
<td>$2,665,691</td>
<td>$7,300,552</td>
<td></td>
</tr>
<tr>
<td>Title III Part an English Lang. Acquis.</td>
<td>$207,449</td>
<td>$222,769</td>
<td>$214,172</td>
<td>$704,214</td>
<td></td>
</tr>
<tr>
<td>Title II-Part A Teachers</td>
<td>$341,830</td>
<td>$230,000</td>
<td>$619,071</td>
<td>$1,190,901</td>
<td></td>
</tr>
<tr>
<td>Two Percent Education Cost Share Grant</td>
<td>$201,903</td>
<td>$201,903</td>
<td>$201,903</td>
<td>$605,709</td>
<td></td>
</tr>
<tr>
<td>Youth Service Bureau</td>
<td>$54,847</td>
<td></td>
<td></td>
<td></td>
<td>$54,847</td>
</tr>
<tr>
<td>Youth Service Bureau-Enhancement</td>
<td>$6,949</td>
<td></td>
<td></td>
<td>$6,949</td>
<td></td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td>$35,533,562</td>
<td>$35,755,506</td>
<td>$45,876,128</td>
<td>$12,815,923</td>
<td>$129,981,120</td>
</tr>
</tbody>
</table>

The spreadsheet maintained by the Grant Accountant is a detailed listing of:

- award amount;
- object codes;
- description of expense;
- vendor or staff name;
- purchase order numbers, where applicable; and
- any remaining balances.

Budget allocations and projections along with narrative descriptions were also captured in the tracking process. Several capital asset purchases were noted for the NPS family center, classrooms, and instructional technology equipment (includes laptops, microphones, hardware, and software).

With the information provided by the NPS Grant Accountant, the Comptroller of the City reviews and compiles the information into a grant summary report for reporting in the federal and state schedules of expenditures at year end in preparation for an external audit.

**COMMENDATION**

**NPS has taken initial steps to maximize the use of grant funds by tracking the expenses they cover and utilizing budgets to guide them.**

### 3.3 **ASSET AND RISK MANAGEMENT**

An effective asset and risk management program aims to control costs by ensuring that NPS is adequately protected against all significant losses. This involves the identification and measurement of risk and techniques to minimize the impact of risk. Capital asset management should account for all NPS property efficiently and accurately, and safeguard it against theft and obsolescence. Effective cash management can provide additional revenue to fund essential programs and operations. Bank reconciliation procedures for all accounts should be completed in a timely fashion and then reconciled to the accounting records as a component of a strong cash management system.

**FINDING**

There are limited debt resources available to address the long-term building renovation plan in NPS. In order for the City to maintain its AAA Bond credit rating with Standard & Poor’s and Fitch and Aaa with Moody’s, the level of debt cannot exceed $400 million. The current debt levels as of June 30, 2020, per the Audited Financial Report is $288 million. Borrowing capacity in each of the next four years for new debt is $40 million consisting of $20 million allowable for new debt and another $20 million available as old debt matures and is retired annually.

Based on a March 2021 Facility Assessment of 18 NPS campus sites completed by Newman + DLR Group, a long-term investment over the next 20 years would cost $429-495 million for varied repairs, replacements, and renovations. Over that period the estimated outlay would
approximate $25 million annually. This report includes a tiered timeline prioritizing the most critical needs and could help the City fulfill its responsibility of addressing the facility needs of the schools. They could do so by factoring in any state aid expected, and work within the required debt limits for the difference needed.

**Exhibit 3-6** shows the tiers created to prioritize the NPS facilities and the estimated costs.

### Exhibit 3-6
**Tiering of NPS Schools**
**March 2021**

<table>
<thead>
<tr>
<th>Tier 1 Facilities:</th>
<th>Years 2-10</th>
<th>$260 Million</th>
</tr>
</thead>
<tbody>
<tr>
<td>· *Fox Run Elementary School</td>
<td></td>
<td></td>
</tr>
<tr>
<td>· *Naramake Elementary School</td>
<td></td>
<td></td>
</tr>
<tr>
<td>· *West Rocks Middle School</td>
<td></td>
<td></td>
</tr>
<tr>
<td>· Central Preparation Kitchen</td>
<td></td>
<td></td>
</tr>
<tr>
<td>· Nathan Hale Middle School</td>
<td></td>
<td></td>
</tr>
<tr>
<td>· Roton Middle School</td>
<td></td>
<td></td>
</tr>
<tr>
<td>· Wolpit Elementary School</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Tier 2 Facilities:</th>
<th>Years 11-15</th>
<th>$135 Million</th>
</tr>
</thead>
<tbody>
<tr>
<td>· Columbus Magnet School</td>
<td></td>
<td></td>
</tr>
<tr>
<td>· Marvin Elementary School</td>
<td></td>
<td></td>
</tr>
<tr>
<td>· Rowayton Elementary School</td>
<td></td>
<td></td>
</tr>
<tr>
<td>· Silvermine Elementary School</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Tier 3 Facilities:</th>
<th>Years 16-20</th>
<th>$65 Million</th>
</tr>
</thead>
<tbody>
<tr>
<td>· Brien McMahon High School/Center for Global Studies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>· Kendall Elementary School</td>
<td></td>
<td></td>
</tr>
<tr>
<td>· Tracey Magnet School</td>
<td></td>
<td></td>
</tr>
<tr>
<td>· Brookside Elementary School</td>
<td></td>
<td></td>
</tr>
<tr>
<td>· Norwalk Early Childhood Center</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Tier 4 Facilities (Not included in FCA): Recent work completed</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>· Norwalk High School/P-Tech</td>
<td></td>
</tr>
<tr>
<td>· Ponus Ridge Middle School</td>
<td></td>
</tr>
<tr>
<td>· Jefferson Elementary School</td>
<td></td>
</tr>
<tr>
<td>· Cranbury Elementary School</td>
<td></td>
</tr>
<tr>
<td>· Lower Ponus Ridge STEAM Academy</td>
<td></td>
</tr>
</tbody>
</table>

*Denotes schools prioritized within Tier 1.


**RECOMMENDATION**

**Recommendation 3-2:**

Utilize the Newman + DLR Group facility assessment of NPS campuses to prioritize what actions to take to continue the renovation plans.

A Joint Education Finance Committee previously formed and consisting of members from the BOE Finance and City Common Council Finance Committees should work to establish a timeline and budget that will facilitate the repair and renovation of campuses informed by the report.
FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

Capital assets purchased with Federal Grant funds are not identified and tracked. IT assets are the only ones tagged and the disposal of any asset is done informally with no centralized process in place. For financial reporting purposes, the City Comptroller maintains records concerning fixed assets for the City and NPS. She uses financial records from MUNIS to update the City’s fixed asset ledger kept in Assetworks (a separate software application) incorporating significant new additions or deletions to the ledger. It does not appear that the City or the NPS currently distinguish the source of funding for major new asset acquisitions.

The NPS Information Technology (IT) Department records the receipt of new technology assets and affixes fixed asset tags to NPS computers, laptops, and other IT devices and equipment. The IT Department maintains itemized records concerning each device, including the source of funding that was used to acquire the asset. The IT Department also manages the disposal of these assets. Although there is not a comprehensive policy or manual for this process, the Department has created various forms and narratives for the teachers and other staff to know how to make acquisition and disposal requests.

With other movable fixed assets, such as furniture and equipment, the NPS does not apply tags to these assets or maintain an itemized listing of these assets. With respect to old, furniture and equipment outside of IT Assets, NPS does not update detailed inventory records on the assumption that doing so would be more costly than the benefit derived from doing so.

RECOMMENDATION

Recommendation 3-3:

Track all capital assets by capturing what funds they are purchased with, tagging them for proper identification after placing in use, and disposing of them with adequate documentation of the disposal.

For most organizations, capital assets tend to make up a significant portion of the organization’s total assets. It is essential that your organization has effective capital asset management.

Some processes to consider include:

- Establish a capital asset policy– It is highly recommended to have a capital asset policy that defines what is considered a capital asset. Use appropriate thresholds when developing your capital asset policy.

- Require approval on all capital asset purchases and disposals– Properly accounting for additions and deletions of your capital assets is important for accurate record keeping. Having a separate approval process performed prior to the actual purchase or disposal of the asset helps ensure that assets are validly added and removed.
• Conduct periodic physical counts of capital assets—To ensure the capital asset listing is up to date with assets still in use, it is recommended that a physical count of the capital assets is performed on a periodic basis. Assets should be tagged appropriately for identification.

• Reconcile general ledger capital asset balance to the capital asset system—Most capital assets records are maintained in a separate module from the general ledger to include additional information about the assets. Reconciling the capital asset system to the general ledger records helps ensure that the capital asset system includes all the items recorded in the general ledger that should be capitalized.

• Federal Education Grants Management requires recipients to have in place an inventory management system to track items purchased with federal funds. The cost principles contained in Office of Management and Budget (OMB), Circulars A-21, A-87 and A-122, require expenditures of federal funds to be—at a minimum—necessary, reasonable, allocable to the program, allowable under the program and legal under state and local law. It is impossible to demonstrate that items purchased with federal funds comply with these cost principles, and benefit the applicable program, if the items cannot be tracked and located by the federal grant recipient.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

There is little to no control over the financial activities of the Activity Funds. Of the 21 campuses, 17 operate their own independent bank accounts utilizing the NPS Employee Identification Number (EIN). The schools are required to provide a monthly bank reconciliation to the Comptroller’s Office. The City’s external auditor also reviews the account balances as part of the financial statement audit each year. Aside from that, no one is really aware of the cash management procedures in place, what fundraising results are, and whether the funds in the accounts are all that should be there.

Some of the recent process changes made included having extra pay to NPS employees funnel through payroll versus activity funds and requiring the use of Positive Pay for all bank accounts. School principals are not directly involved and rely heavily on the clerical staff to handle all transactions. There are at least two signers for each bank account, but NPS Finance staff are not familiar with their identity.

RECOMMENDATION

Recommendation 3-4:

Centralize all activity fund transactions.
The current MUNIS finance software system offers an Activity Fund module that can facilitate this process. Using the system will bring all transactions into one place where they can be reviewed and authorized by finance personnel. Additional advantages of centralization include:

- enhanced visibility of the cash flows;
- increased efficiency by reducing redundancies; and
- improved management of risks.

FISCAL IMPACT

This recommendation can be implemented with existing resources. There will be some costs to purchase and learn how to use the MUNIS Activity Fund module but in light of the conversion in April, some or all of the changes may be included in the upgrade. Therefore, it is not possible to estimate the cost at this time.

3.4 MANAGEMENT AND BUDGETS

The NPS Budget Department is headed up by a Budget Director and three other staff who help to compile and manage the budget. The Department plans, organizes, and manages the preparation, administration and evaluation of NPS operating, capital, and special revenue fund budgets.

Some of the major processes of the function include:

- overseeing the development of the budget format, including procedures and forms for the collection and assessment of budget information, establishment of quality control points, and methods for evaluating budget performance;

- coordinating review of budget requests with school administrators according to fiscal and school year schedules;

- providing budgetary control information to departments and school administrators;

- reviewing and recommending action on requests for operating budget adjustments with the Chief Business and Finance Officer;

- assisting principals and other administrators in the organization and management of department budgets;

- providing statistical and technical information necessary for the development of the operating, capital, and special revenue fund budgets;

- preparing near-term and long-range projections of financial operations for the District; and

- assisting in the preparation and submittal of various required state and federal reports.
Exhibit 3-7 shows the Budget Calendar for FY 2023.

### Exhibit 3-7
**Budget Calendar**
**FY 2023**

<table>
<thead>
<tr>
<th>Activity</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personnel rosters sent to Schools and Central Office Departments for verification</td>
<td>w/o 9/6/21</td>
</tr>
<tr>
<td>Budget request packages distributed to Central Office Departments</td>
<td>w/o 9/13/21</td>
</tr>
<tr>
<td>Central Office Departments return budget requests</td>
<td>10/13/21 or before</td>
</tr>
<tr>
<td>Finance/Central Office review of budget requests</td>
<td>10/13-10/29/21</td>
</tr>
<tr>
<td>Board of Education workshop on budget</td>
<td>12/14/21</td>
</tr>
<tr>
<td>Review budget recommendation at regular Finance Committee meeting</td>
<td>12/15/21</td>
</tr>
<tr>
<td>Superintendent’s Recommended 2022-23 Operating Budget approved by the BOE</td>
<td>12/21/21</td>
</tr>
<tr>
<td>BOE to submit Board Approved requested operating budget to City CFO</td>
<td>12/22/21</td>
</tr>
<tr>
<td>Joint Meeting with the BOE Finance and City Finance committees – BOE Review</td>
<td>1/13/22</td>
</tr>
<tr>
<td>Operating Budget Recommendation to BET by City CFO</td>
<td>2/7/22</td>
</tr>
<tr>
<td>City CFO to present Operating Budget Recommendation to Common Council Finance &amp; Claims</td>
<td>2/10/22</td>
</tr>
<tr>
<td>Student-Based Budget Packages sent to school principals for development of student-based, school budgets</td>
<td>Feb-March TBD</td>
</tr>
<tr>
<td>Common Council Finance Committee holds public hearing on operating budget; Operating cap recommended to Council</td>
<td>2/17/22</td>
</tr>
<tr>
<td>Common Council adopts preliminary expenditure cap</td>
<td>2/22/22</td>
</tr>
<tr>
<td>BOE meets with Board of Estimate &amp; Taxation to review BOE budget request (6:30PM)</td>
<td>2/28/2022</td>
</tr>
<tr>
<td>BET Public Hearing on Operating Budget</td>
<td>3/23/22</td>
</tr>
<tr>
<td>Principals receive input from School Governance Councils and return budget request to Central Office</td>
<td>March TBD</td>
</tr>
<tr>
<td>Board of Estimate and Taxation adopts tentative budget and forwards to Common Council</td>
<td>3/29/22</td>
</tr>
<tr>
<td>Common Council sets final cap</td>
<td>4/12/22 (no later than 4/19/22)</td>
</tr>
<tr>
<td>City CFO presents Tentative Operating Budget and Tax Levy</td>
<td></td>
</tr>
<tr>
<td>Board of Education reviews School-based budgets</td>
<td>TBD – May</td>
</tr>
<tr>
<td>Board of Estimate and Taxation adopts final operating budget and Tax levy</td>
<td>5/2/22</td>
</tr>
<tr>
<td>Superintendent and CFO reconcile budget to final BET approved budget – revise per student allocations if necessary</td>
<td>TBD – May</td>
</tr>
<tr>
<td>School principals revise Student Based Budget, to meet revised allocations, if necessary</td>
<td>TBD – May</td>
</tr>
<tr>
<td>Board of Education adopts the final FY 2022-23 budget</td>
<td>5/24/22</td>
</tr>
</tbody>
</table>

*Source: Norwalk Public Schools, Budget Director, 2021.*

**FINDING**

The federal revenue received to offset the impact of the COVID pandemic is used for recurring expenses that will no longer be covered when the funding stops beginning with FY2023 and beyond.

As of June 30, 2021, NPS had received a total of $45.9 million of grant awards related to COVID relief funds and expended $6.9 million. Approximately $14 million is available through 9/30/23 and $25 million is available through 9/30/2024. The bulk of the remaining available balances have been allocated to salaries and related benefits for new teachers, social workers,
counselors, and coaches. Other allocations for technology, family center, and training were also made. It is not clear what the plan is to cover these recurring expenses after September 30, 2024. NPS stated that the issue would be addressed in the next budget season.

Per the U.S. Department of Education Section 18003(d) of the CARES Act, Section 313(d) of the CRRSA Act, and Section 2001(e) of the ARP Act, ESSER Funds may be used for a broad range of activities including:

- coordinating and preparing for response efforts;
- training on sanitation and minimizing the spread of infectious diseases;
- purchasing cleaning and sanitizing products; and
- addressing the needs of certain groups of students such as low-income, English learners, and racial and ethnic minorities.

Providing principals and other school leaders with the resources necessary to address the needs of their individual schools is allowable. Additionally, purchasing educational technology (including hardware, software, and connectivity) for students that assists in regular and substantive educational interaction between students and their classroom instructors is allowable.

The broad language leaves much interpretation to what resources are considered necessary and there is no language that prohibits the hiring of staff with the funds. However, the ESSER Fund is an emergency fund meant to overcome barriers created by the COVID-19 pandemic and have a time limit on their availability.

RECOMMENDATION

Recommendation 3-5:

Develop a plan now to address the sustainability of expenditures to avoid facing a funding cliff.

The capacity to use local resources beyond the availability of these federal funds must be examined and the use of other sources of funds to close any gaps must be identified.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

Tension exists between the City and NPS over funding for the schools. The City believes the NPS budget is filled with unnecessary fluff and inefficiencies.

NPS appears in the City budget as a Department (labeled Education) of the City much like the Police, Fire, and Community Services departments appear. The school typically carries 50 percent or more of the grand total for expenditures as noted in Exhibit 3-8.
### Exhibit 3-8

**City Budget Expenditures**

FY 2021 and 2022

<table>
<thead>
<tr>
<th>Department</th>
<th>Approved Budget FY 2020-21</th>
<th>Approved Budget FY 2021-22</th>
<th>FY 2021 Vs. FYE 2022 Variance Increase / (Decrease)</th>
<th>FY 2021 Vs. FYE 2022 Variance Increase / (Decrease)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contingency</td>
<td>$2,788,765</td>
<td>$1,500,000</td>
<td>($1,288,765)</td>
<td>(46.2%)</td>
</tr>
<tr>
<td>Education</td>
<td>208,415,928</td>
<td>208,468,385</td>
<td>52,457</td>
<td>0.0%</td>
</tr>
<tr>
<td>Police &amp; Fire</td>
<td>45,878,511</td>
<td>47,517,888</td>
<td>1,639,377</td>
<td>3.6%</td>
</tr>
<tr>
<td>Employee Benefits</td>
<td>33,988,048</td>
<td>35,078,683</td>
<td>1,090,635</td>
<td>3.2%</td>
</tr>
<tr>
<td>Debt Service</td>
<td>32,446,428</td>
<td>36,925,620</td>
<td>4,479,192</td>
<td>13.8%</td>
</tr>
<tr>
<td>Operations &amp; Public Works</td>
<td>23,223,684</td>
<td>24,743,182</td>
<td>1,519,498</td>
<td>6.5%</td>
</tr>
<tr>
<td>Pension Contributions</td>
<td>13,172,540</td>
<td>15,362,160</td>
<td>2,189,620</td>
<td>16.6%</td>
</tr>
<tr>
<td>Community Services</td>
<td>9,146,000</td>
<td>9,769,752</td>
<td>623,752</td>
<td>6.8%</td>
</tr>
<tr>
<td>Economic &amp; Community Development</td>
<td>4,374,394</td>
<td>4,895,866</td>
<td>521,472</td>
<td>11.9%</td>
</tr>
<tr>
<td>Finance Department</td>
<td>6,621,281</td>
<td>7,038,014</td>
<td>416,733</td>
<td>6.3%</td>
</tr>
<tr>
<td>General Government</td>
<td>4,132,667</td>
<td>4,396,482</td>
<td>263,815</td>
<td>6.4%</td>
</tr>
<tr>
<td>Grants</td>
<td>1,357,807</td>
<td>858,035</td>
<td>(499,772)</td>
<td>(36.8%)</td>
</tr>
<tr>
<td>Organizational Memberships</td>
<td>84,048</td>
<td>84,000</td>
<td>(48)</td>
<td>(0.1%)</td>
</tr>
<tr>
<td><strong>GRAND TOTAL</strong></td>
<td>$385,630,101</td>
<td>$396,638,067</td>
<td>$11,007,966</td>
<td>2.9%</td>
</tr>
</tbody>
</table>

Source: City of Norwalk Approved Operating Budget Book Fiscal Year, 2021-22.

Based on Connecticut State Law, what is known as a Minimum Budget Requirement (MBR) puts limitations on the City’s budgeting as stated below:

*Connecticut’s MBR prohibits a municipality from budgeting less for education than it did the previous year, unless it meets specific exceptions. School districts that are in the top 10 percent of all school districts, according to the Connecticut State Department of Education’s (CSDE) accountability index, are exempt from MBR requirements. However, towns whose local public-school districts are Alliance Districts (the thirty-three lowest performing local public-school districts in the state) are not permitted to reduce educational expenditures and are not eligible for any of the MBR exceptions. As part of the biennial state budget passed in June 2019, the Connecticut General Assembly reauthorized the MBR requirements for fiscal years 2020 (2019-20 school year) and 2021 (2020-21 school year)*

*In 1975, the Connecticut General Assembly created the minimum expenditure requirement, which required towns to spend a minimum amount per pupil on education based on statewide expenditures. This requirement, now slightly altered and known as the MBR, was implemented to prevent towns from reducing their local spending on education and using state aid for education as a replacement for local funds, as well as to prevent towns from using state funds targeted for education for other purposes.*

To add yet another layer of complexity, NPS has its own governing Board of Education that determines and guides them on how their appropriation from the City is spent each year. The City has no input in that process. The funding NPS receives from the City is primarily from the property taxes collected by the City.
The perception is that NPS is excessive and overstated. These perceptions are prevalent throughout the City administration-levels and have hindered collaboration between the City and NPS. A Joint Education Finance Committee had been formed to facilitate conversations about the NPS budget before it gets adopted. This Committee has met three times since being formed—once in 2020 and twice in 2021.

**RECOMMENDATION**

**Recommendation 3-6:**

*Develop a plan for the Joint Education Finance Committee to meet quarterly and address specific budget questions, concerns, and ways to allocate other funds where applicable before adopting the budget.*

This Committee can also be a platform for much needed open communications beyond the budget matters between NPS and the City of Norwalk. All other issues concerning staff and shared challenges could be brought to the table and discussed openly as a team seeking shared solutions. Agenda items can include requests for additional funding with appropriate justifications, but should also encompass other priorities that impact both organizations. All discussions within the committee and outside of it should be mutually respectful toward its members and factually based regarding its topics.

Collaboration with peer districts who are similar in enrollment but operating with less funding could reveal budget scenarios and allocations not considered. Substantive questions about spending efficiency should be addressed to glean different ways to achieve desired goals.

A sincere effort should be initiated to talk and discuss all of the concerns regarding the Budget and other Finance matters from both the NPS and City perspectives. It is inevitable that conflicts will arise; however, they can and should be resolved by mutual understanding between the two organizations. Both have important work to do for the same community drawing on the same financial resources for the welfare of the same taxpayers. NPS and the City should strive always to work together for causes which are of mutual interest.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING**

Position control was not a tool previously utilized in the budget process. It was implemented with the hiring of a new Budget Director who set up a MUNIS PCN (Position Control Number) system that stays with the job position versus the employee in the position. Funding also goes with the PCN. As a result, answering questions about open positions and what amount of funding is left was now focused on the role and its significance to the department. Additionally, an Applitrak (recruiting program designed for schools) job requisition process flow between the Finance and the HR Departments was created to capture open slots and get candidates for the positions. The well-defined profiles of the Position Control system enhanced the hiring process and ensured that budget and financial impact was adequately considered.
COMMENDATION

NPS is maximizing the use of Position Control as a budgetary tool and a guide for adding new positions or changes to positions.

3.5 PURCHASING AND ACCOUNTS PAYABLE

The purchasing function for Norwalk Public Schools (NPS) is coordinated and managed by the Purchasing Agent under the direction of the Chief Financial Officer. The Purchasing Agent oversees the work of a Purchasing Representative and two Purchasing and Accounts Payable Clerks. Schools and departments participate in the processes, but all formal competitive purchasing activities are handled in the Purchasing Office.

Exhibit 3-9 provides an overview of the purchasing thresholds and the types of competitive purchasing methods and approvals required within each category. In 2020, the External Auditor found that NPS purchasing standards did not meet the essential standards outlined in 2 CFR Sections 200.318 through 200.328 relating to federal awards.

As shown below, the Purchasing Department has initiated changes to NPS policies and procedures to comply with those standards these are shown in red to indicate that final approval of the Board of Education is pending.
## Exhibit 3-9
Norwalk Public Schools Purchasing Thresholds

### BOE Purchasing Thresholds and Approval Paths

<table>
<thead>
<tr>
<th>Threshold or Procurement Type</th>
<th>Micro Purchases Up to $75</th>
<th>Up to $3,000</th>
<th>$3,000 to $7,500</th>
<th>Over $7,500 (Between $10,000 &amp; $249,999)</th>
<th>Over $250,000</th>
<th>Single Source</th>
<th>Emergency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Competitive Procurement Used</td>
<td>None Required</td>
<td>Encouraged to solicit one or more quotes</td>
<td>Must solicit two or more quotations</td>
<td>Competitive Sealed Bid or Proposal</td>
<td>Competitive Sealed Bid</td>
<td>Justification for Single Source</td>
<td>Such competition as is practicable under the circumstances</td>
</tr>
<tr>
<td>Funds Encumbered Prior to Purchase?</td>
<td>Recommended that purchases under $75 either be grouped with other orders or purchased via PCard (Cost prohibitive)</td>
<td>Yes, with quotes attached to requisition, if applicable</td>
<td>Yes, with quotes attached to requisition</td>
<td>Yes, Request for Bid/ RFP form submitted to Purchasing Agent</td>
<td>Requisition entered by purchaser</td>
<td>A Request for Waiver is sent to Superintendent of Schools or the Chief Financial Officer</td>
<td></td>
</tr>
<tr>
<td>Required Approval</td>
<td>Principal or Department Head</td>
<td>Principal or Department Head</td>
<td>Principal or Department Head</td>
<td>Purchasing Agent and Superintendent Approve Final Award; Superintendent signs contracts</td>
<td>Purchasing Agent and Superintendent Approve Final Award; Superintendent signs contracts</td>
<td>Superintendent of Schools or the Chief Financial Officer; Superintendent signs contracts</td>
<td>Superintendent of Schools or the Chief Financial Officer; Superintendent signs contracts</td>
</tr>
</tbody>
</table>

**Source:** Compiled by Evergreen through document review and interviews, December 2021.
FINDING

NPS provides campus and departmental staff training and documentation on the purchasing process to assist the users in navigating the process and to ensure that policies and procedures are followed.

The NPS Purchasing Manual contains purchasing procedures that guide the staff through the process of making purchases. Definitions of the various types of purchases, instructions on how to initiate purchases within the thresholds shown above, and copies of various forms are provided for the user. Step-by-step procedures for the use of P-Cards guides the user through the steps in obtaining a P-Card, using the card, and reconciling their purchases on a monthly basis.

The Manual also includes a section on the Cost of Processing and Purchase Order which helps the user to understand why it is appropriate and cost effective to consolidate “micro purchases” of under $75, as pointed out in the Purchasing Threshold chart above.

In addition to the manual, Purchasing has prepared a number of Power Point presentations and flow charts to illustrate the processes.

Exhibit 3-10 provides an example from a presentation created to introduce the Finance Team to the users and explain the processes described in the Purchasing Manual in greater detail.

Exhibit 3-10
Staff Development Flow Chart Example

COMMENDATION

The purchasing training and user support documents provided to NPS employees provide detailed instructions for processing purchases through to the point when invoices are paid.

FINDING

The term ‘Emergency’ is not defined in policy and this could lead to some purchases being deemed an emergency when they do not technically meet the criteria.

The Purchasing Manual outlines the processes and procedures for the handling of Emergency purchases, however, as shown in the excerpts below, the determination of what constitutes an emergency is left to the discretion of the Superintendent and Chief Financial Officer. [emphasis added]:

Purchases over $7,500: The purchaser must complete a Request for Bid/RFP form and the Purchasing Department will solicit sealed bids or proposals for the purchase of goods or services above $7,500.

A contact in any amount, within budgetary limits, may be awarded for goods or services [without competition] when the Superintendent or Director of Finance documents in writing that one of the following conditions exists (BOE policy 3323):

a. When the service or goods offered is unique to one vendor;

b. When equipment is being purchased for compatibility with existing equipment;

c. When an emergency exists and there is insufficient time to solicit bids/proposals;

If one or more of these conditions exist, the person requesting the waiver must complete a Bid Waiver Request form to be submitted to the Purchasing Department for approval and to remain on file with the approved final purchase order.

Emergency: In an emergency, the District’s normal procurement procedures may be waived. The decision as to whether a given situation is an emergency shall be made by the Superintendent of Schools or the Chief Financial Officer. A Request for Waiver form must be completed if necessary. A purchase order for said goods and services shall be completed with the appropriate information.

The Request for Waiver Form shown in Exhibit 3-11 restates the information found in the Purchasing Manual.
Exhibit 3-11
Request for Waiver Form

Norwalk Public Schools
Purchasing Department

Request for Waiver of Competitive Bidding

Pursuant to the purchasing policy adopted by the Board of Education, Norwalk Public Schools is required to purchase goods and services through the most competitive processes. “Competitive bidding shall be practiced wherever feasible and to the advantage of the Norwalk public Schools” (policy 3323). For purchases in excess of $3,000 quotes of two or more are required. For purchases in excess of $7,500 bids/RFP are required.

The BOE policy does allow for waiving the bid process (by the CFO or Superintendent) when any of the following conditions exist:

1. When the service or goods offered is unique to one vendor.
2. When equipment is being purchased for compatibility with existing equipment.
3. When and emergency exists and there is insufficient time to write specifications and take bids.

This request for waiving of bid requirement is due to:___________________________________________
_____________________________________________________________________________________
_____________________________________________________________________________________
_____________________________________________________________________________________
_____________________________________________________________________________________

Please attach this document along with quotes and other relevant documents with this submission.

Submitted to Purchasing by:____________________________ Title:____________________________

Signature:___________________________________________ Date:___________________________

Approved By (Superintendent or CFO):_____________________

Date:___________________________

For questions concerning this form or purchasing requirements, please contact the purchasing department at 203-854-4036 or bartronk@norwalkps.org.

Source: Norwalk Public Schools Finance Department, December 2021.
Purchasing procedures must be flexible, particularly when dealing with the safety and well-being of students. In the absence of a definition of what constitutes an emergency, poor planning and procrastination are too often brought forth as an emergency.

A common definition of an emergency used by many governmental agencies, including school districts, is “a situation that creates a threat to public health, welfare, safety, or public property, or conservation of public resources such as may arise by reason of natural disasters, equipment failures, or such other reasons as may create an immediate and unforeseeable threat.”

RECOMMENDATION

Recommendation 3-7:

Include a general definition of what constitutes an emergency for the purpose of bypassing the normal competitive procurement processes.

While purchases made necessary by poor planning may still create an emergency as defined, repeated requests for a waiver to the competitive procurement procedures by any individual or department should be dealt with as a disciplinary matter and handled accordingly by NPS Leadership.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

In most cases, Norwalk Public Schools requires all purchasers to enter a requisition into the MUNIS system in advance of purchases being initiated.

Exhibit 3-12 illustrates the purchasing process for purchases under $20,000.
Exhibit 3-12
Purchasing Flows
Purchases Under $20,000

Source: Compiled by Evergreen through document review and interviews, December 2021.
The MUNIS System has a powerful control process that begins at the time that a requisition is entered into the system. Once the requestor begins entry, the MUNIS controls are triggered. If there are insufficient budgeted funds remaining in the account code entered by the requestor, MUNIS will prevent the user from making the entry. At that point, the user must determine if the budget account code entered is incorrect or whether a request to move money into the account is necessary before a purchase can be initiated. If sufficient unincumbered money remains in the budgeted line item, MUNIS then sends the requisition through a pre-set approval path, beginning with the department head or principal and ending with a determination that a purchase order can be initiated to the vendor. At that point, the funds are encumbered, meaning that the funds cannot be used to purchase other items, thereby preventing multiple users from attempting to make purchases using the same funds.

When the requisitioning process is bypassed, the possibility of overspending of budgeted funds is significantly increased. When purchases are made, committing the schools to pay for the items purchased, and funds are not available, hard decisions are required to move money from other accounts to cover the purchase. When this practice is allowed to continue without consequences, the purpose and intent of the School Board’s budgeting and approval process is circumvented.

COMMENDATION

Requiring requisitions and purchase orders encumbering funds at the time that a decision to purchase is made deters the overspending of budgets.

FINDING

The P-Card issuance and use processes are well-defined and monitored. In collaboration with the City Comptroller’s Office, NPS has developed and is using controlled processes and procedures for the issuance and monitoring of P-Cards.

Exhibit 3-13 illustrates the processes for obtaining a P-Card, and Exhibit 3-14 illustrates the process for using the P-Card and reconciling the purchases on a regular and ongoing basis.
Exhibit 3-13
P-Card Issuance Flow

Source: Compiled by Evergreen through document review and interviews, December 2021.
Exhibit 3-14
P-Card Use Flow

BOE Use and Reconciliation of P-Card Purchases

- **Bank of America/ Card Issuer**
  - **Denied**
  - **Approved**
  - **Is purchase within limits?**
    - No
    - Yes

- **Cardholder**
  - Cardholder attempts to make purchase
  - Cardholder obtains receipt with item descriptions and amounts
  - Cardholder signs onto the BOA Works System, validates the purchase, adds the appropriate Org Code, Cost Center, Object Code, and Project/Location Code, and uploads the documentation for the purchase
  - Employee conducts periodic and monthly reconciliations of all purchases checking a box next to each purchase to signify that the purchase is valid, all documentation is attached and all coding for accounting purposes is correct
  - Correct it or obtain the missing documents and load to system
  - Something suspicious?
    - Yes
    - No

- **Purchasing Department/ P-Card Administrator**
  - Administrator receives the problem and works with the employee and/or BOA to dispute the charges
  - Problem(s) resolved?
    - Yes
    - No
  - Administrator reviews all employee records in BOA Works Application
  - Authorization is sent to Comptroller to pay the bill

- **Comptroller**
  - PAIN POINT
    - Are sufficient funds in the budget?
      - Yes
      - No
    - Move money to cover the budget overrun

Source: Compiled by Evergreen through document review and interviews, December 2021.
The NPS P-Card Administrator receives activity emails from Bank of America daily and reviews the charges. This daily review of the purchases as they are occurring allows the Administrator to intervene if suspicious activity occurs. As a result, the Administrator said they have identified fraudulent purchases and have been able to work with the Comptroller staff to cancel the card before the purchases got out of hand.

Once a month the Administrator reconciles the account and verifies that everything is charged to the right account and that the accounts have sufficient funds available to cover the charges. Users are required to upload all receipts, quotes, and other documentation and sign off on charges by the 5th of the month. She reviews the documentation and if any is missing or if the purchaser has not signed off on the purchase, she follows up. The reconciliations are due to the Comptroller by the 15th of each month. The Comptroller then uploads into MUNIS – and that is when the funds are encumbered by account code.

There is a possibility of overspending in a given budget code; however, this happens only infrequently. If this happens, the Administrator works with the purchaser and department head to resolve the issue either by changing the account code to which the purchase is charged, or by requesting that money be moved from other accounts to cover the purchase.

As of October 2021, NPS had 52 P-Cards issued to employees. Each card is issued in the name of the cardholder, and each has a daily and monthly purchasing limit. As shown in Exhibit 3-15, 32 of the cardholders have a standard daily limit of either $1,000 or $1,500 and a monthly limit of $5,000.

### Exhibit 3-15
P-Card Spending Controls
October 2021

<table>
<thead>
<tr>
<th>Monthly Limit</th>
<th>Daily Limit</th>
<th>Count of NPS Cards</th>
</tr>
</thead>
<tbody>
<tr>
<td>$5,000</td>
<td>$1,000</td>
<td>4</td>
</tr>
<tr>
<td>$5,000</td>
<td>$1,500</td>
<td>28</td>
</tr>
<tr>
<td>$7,500</td>
<td>$2,500</td>
<td>4</td>
</tr>
<tr>
<td>$10,000</td>
<td>$3,000</td>
<td>2</td>
</tr>
<tr>
<td>$10,000</td>
<td>$5,000</td>
<td>6</td>
</tr>
<tr>
<td>$20,000</td>
<td>$10,000</td>
<td>1</td>
</tr>
<tr>
<td>$30,000</td>
<td>$20,000</td>
<td>7</td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td></td>
<td><strong>52</strong></td>
</tr>
</tbody>
</table>

Source: NPS Comptroller’s Office, November 2021.

Those with higher limits include employees in Purchasing, Facilities and individuals in the Center for Global Studies, all with an identified need.

**COMMENDATION**

Controls over the P-Card issuance and use are strong and include daily monitoring of purchases to detect fraudulent or inappropriate purchases, verify account codes, and generally ensure that quotes are obtained when required for competitive procurements.
FINDING

The thresholds for larger purchases, including capital purchases, are lower than are outlined in the Federal Uniform Guidance Procurement Standards set forth in Section 200.318 through Section 200.326 of the Code of Federal Regulations (CFR), with respect to all procurements, which are funded in whole or in part by federal funding, and whenever else federal law dictates.

Exhibit 3-16 illustrates the current processes for making purchases over $20,000.
Exhibit 3-16
Purchases Over $20,000

Source: Compiled by Evergreen through document review and interviews, December 2021.
**FINDING**

The Amazon Business Account was set up to eliminate sales tax on orders and to tighten controls over purchases made through Amazon.

Because NPS is tax exempt, users are instructed to notify the vendors so that sales tax is not charged for purchases. Employees ordering through Amazon, however, were charged sales tax automatically. The convenience and availability of goods through Amazon enticed employees to continue to use the service, meaning that the amounts charged to the employee’s assigned P-Card included a sales tax that the vendor would not remove. To remedy this situation, the City applied for and obtained a business account which is tax exempt as shown in Exhibit 3-17.
Exhibit 3-17
Amazon Business Account Process

Source: Compiled by Evergreen through document review and interviews, December 2021.
As illustrated, the process for using the Amazon Business Account contains a number of control steps to ensure funds are appropriately encumbered prior to purchase.

In the past, users were making the purchase with their assigned P-Cards, which was outside of the normal MUNIS approval process. The Amazon Business Account requires the purchaser to enter a requisition into MUNIS prior to the order being placed.

COMMENDATION

NPS set up the Amazon Business Account to eliminate sales tax on orders and has effectively used the account to tighten purchasing controls.

FINDING

The process for receiving and invoicing goods and services is well-defined and monitored, but the process is cumbersome because paper rather than electronic copies are physically routed to the Comptroller’s Officer for payment.

Exhibit 3-18 illustrates the process for receiving good or services and then routing the receiving documents and invoices to the Comptroller’s Officer for payment.

As shown, when the good or services are received, the receiving documents are scanned and sent to Accounts Payable. In an attempt to further reduce paperwork while controlling the process, vendors are required to send all invoices to an Accounts Payable email address.

The scanned copies of the receiving documents and the invoices are matched by Accounts Payable. Prior to sending the packet of information to the Comptroller for Payment, Accounts Payable prints out hard copies of all of the information and physically sends the paper packet of information to the Comptroller for payment.

Comptroller staff examine the paper copies and approve or reject the request for payment. If rejected, the paper files are physically sent back to the Accounts Payable Department for corrections or additions. If approved, Comptroller staff authorize the check to be cut, and then scan the paper documents and load them into MUNIS.

MUNIS is capable of accepting scanned documents and has approval paths set up that would allow Accounts Payable to enter the invoices and verify that all required documents are ready for approval by the Comptroller team.

Within MUNIS, the Comptroller staff could examine the electronic documentation and if something is missing the rejection would be done electronically, thereby eliminating days and excessive paper from the processing of payments.
Exhibit 3-18
Receiving and Invoicing Processes

Source: Compiled by Evergreen through document review and interviews, December 2021.
RECOMMENDATION

Recommendation 3-8:

Work with the Comptroller’s staff to implement an electronic process for submitting requests for payment.

A similar recommendation is made to the City in an effort to assist in the collaboration effort. This recommendation is already in progress. A team including members of both the City and NPS has been formed to address process automation.

FISCAL IMPACT

This recommendation can be implemented with existing resources

3.6 POLICIES AND PROCEDURES

Policies and procedures allow an employer to commit to writing an organization’s values and mission. They also set standards of behavior, conduct and performance for employees. As a result, policies and procedures clearly define and set the expectations for employees and provide a source of reference for employees to be able to review and check if they are meeting those expectations.

Policies and procedures let employees know where they can turn to for help. All policies should have a point of contact for queries relating to that policy so employees know who they can contact for questions. Further, policies and procedures will set out the processes and options available for how job duties can be performed in the workplace.

FINDING

NPS has some documented policies and procedures which include a Purchasing Manual, process flowcharts, and specific desk procedures. They have also made available training guides for the schools to know how to use MUNIS. However, there is no comprehensive Procedures Manual—online or in hard copy.

Exhibit 3-19 provides a listing of the current policies and procedures for NPS.

Exhibit 3-19
List of Policies and Procedures

<table>
<thead>
<tr>
<th>Description</th>
<th>Date last updated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accounts Payable Process Flow Chart</td>
<td>3/18/21</td>
</tr>
<tr>
<td>BoardDocs.com—for Board Policies</td>
<td>NA</td>
</tr>
<tr>
<td>Chart of Accounts Listing</td>
<td>10/26/21</td>
</tr>
<tr>
<td>Department Codes Help Guide</td>
<td>NA</td>
</tr>
<tr>
<td>Position Control Workflow Process</td>
<td>9/17/21</td>
</tr>
<tr>
<td>Procurement Policy</td>
<td>6/6/95</td>
</tr>
<tr>
<td>Purchasing Manual</td>
<td>8/6/21</td>
</tr>
<tr>
<td>Purchase Order Process Flow Chart</td>
<td>3/18/21</td>
</tr>
<tr>
<td>Recruiting Guidance Tutorial via AppliTrak</td>
<td>9/17/21</td>
</tr>
</tbody>
</table>

Source: NPS Finance Staff, 2021.
A Procedures Manual is a consolidation of updated guidelines and previously issued documents designed to provide a comprehensive presentation of standardized procedures that are mandated by state law, board policy, administrative directives and/or good business practices.

Compliance with these provisions is mandatory for all local, state, and federal funds processed through the Finance Department regardless of their source. Procedures provide guidance for daily operations and help ensure an efficient and effective workflow.

RECOMMENDATION

Recommendation 3-9:

Develop a comprehensive Procedures Manual for the Finance Department.

This recommendation is in progress. The IT Department is building a Finance Intranet page similar to the HR page where the policies and procedures can be easily accessed by NPS staff.

A comprehensive Procedures Manual, online and/or hard copy is vital to smooth and consistent operations. Conformance with these guidelines will allow prompt and accurate conducting of NPS business affairs in a responsive and progressive manner. Principals and department heads should inform their staff so that they are aware of the guidelines that may pertain to their particular area. An online format would allow for easier access and updates made more readily when needed.

FISCAL IMPACT

This recommendation can be implemented with existing resources.
CHAPTER 4: OPERATIONS
4.0 OPERATIONS

The NPS School Business and Operations Department includes the primary functions of facilities and maintenance, school health services, food service, grants management, transportation and safety and security.

For purposes of this study, this chapter addresses the broad areas of:

4.1 Facilities and Maintenance
4.2 Transportation
4.3 School Health Services

Grants management is addressed in the Financial Management chapter of this report. The scope of this study did not include the food service or safety and security functions. In each of these areas, there is a single district coordinator who provides oversight for the program. The Safety and Security function is overseen by the District Safety and Preparedness Coordinator who is responsible for the creation of a standard resource guide for all schools, establishing a school safety team in each school, and creating a year-long school safety activity schedule that includes drills and exercises. The Food Services Coordinator serves as the contract manager for the outsourced school nutrition program.

Exhibit 4-1 provides an overview of the organization structure of the Business and Operations Department.

Exhibit 4-1
Business and Operations Organization Structure

Source: Compiled by Evergreen, January 2022.
4.1 **FACILITIES AND MAINTENANCE**

The Facilities and Maintenance Department manages and supervises plant operations and building services to ensure a clean, safe, and comfortable environment for all students, staff, and the public. They provide facilities planning, design, construction, repair, maintenance, HVAC, environmental services, life, health and safety systems and equipment, energy management systems and energy conservation programs.

There is a joint facilities role between the City of Norwalk and Norwalk Public Schools. The City’s Building and Facilities Manager is the primary contact for development and construction of NPS capital project school buildings. The NPS Director of Facilities and Maintenance is the primary contact for the NPS-managed projects and for maintenance of the buildings.

**Exhibit 4-2** provides the organization of the NPS Facilities Department.

**Exhibit 4-2**
Facilities Organization Structure

![Facilities Organization Structure Diagram]

Source: Compiled by Evergreen, January 2022.

4.1.1 **Facilities Construction and Maintenance**

The City of Norwalk owns the land and the school facilities. City Ordinance Chapter 30 Capital Projects Program states:

§ 30-15: *Implementation and oversight of City capital building projects.*

The Land Use and Building Management Committee of the Common Council, or any successor thereto (the “Land Use Committee”) shall have responsibility for the implementation and oversight of City capital building projects, as provided herein.
§ 30-15.1 Powers and duties.

The Land Use Committee shall provide project management and oversight of all City capital building projects in excess of $400,000 or as designated by the Common Council, including oversight of project planning and design, recommending selection of architect and construction manager or general contractor, project execution planning, status tracking for schedule and budget, reporting, project completion and closeout. City capital building projects do not include public infrastructure improvements, such as roads, bridges and drainage, which shall continue to be the responsibility of the Department of Public Works.

§ 30-16 Designation of School Building Committee.

A. The Land Use Committee is hereby designated and shall serve as the Norwalk School Building Committee and shall have all such power and authority as may be necessary to properly perform and discharge its responsibilities and obligations pursuant to the Connecticut General Statutes.

B. The Land Use Committee shall commence service as the Norwalk School Building Committee as of the effective date of this amendment. All actions taken by the Norwalk Facilities Construction Commission in its capacity as the Norwalk School Building Committee prior to such date are hereby ratified and confirmed.

Exhibit 4-3 shows that compared to its peer school districts, in 2019-20, NPS had an average of 554 students (membership) per school plant while the median was 710 students.

Exhibit 4-3
Peer School District Average Number of Students per School Plant
2019-20 School Year

<table>
<thead>
<tr>
<th>School District</th>
<th>Schools with Membership</th>
<th>Average Membership per School Plant</th>
<th>Peer Rank</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0-180</td>
<td>181-600</td>
<td>601+</td>
</tr>
<tr>
<td>Norwalk</td>
<td>1</td>
<td>15</td>
<td>5</td>
</tr>
<tr>
<td>Greenwich</td>
<td>0</td>
<td>12</td>
<td>3</td>
</tr>
<tr>
<td>Fairfield</td>
<td>0</td>
<td>11</td>
<td>5</td>
</tr>
<tr>
<td>Danbury</td>
<td>1</td>
<td>12</td>
<td>5</td>
</tr>
<tr>
<td>Westport</td>
<td>0</td>
<td>5</td>
<td>2</td>
</tr>
<tr>
<td>Stamford</td>
<td>0</td>
<td>5</td>
<td>16</td>
</tr>
<tr>
<td>White Plains, NY</td>
<td>0</td>
<td>0</td>
<td>7</td>
</tr>
<tr>
<td>New Rochelle, NY</td>
<td>0</td>
<td>3</td>
<td>7</td>
</tr>
<tr>
<td><strong>Median</strong></td>
<td>0</td>
<td>8</td>
<td>5</td>
</tr>
</tbody>
</table>


Exhibit 4-4 shows the NPS campus enrollment, total building square feet, and building square feet per student. The high schools have nearly 4,000 students, while the middle schools have almost 2,600 students. The elementary schools have the largest number of campuses to serve more than 5,000 students.
Exhibit 4-4
Campus Enrollment, Building Square Feet, Square Feet per Student
Based on Student Enrollment as of January 1, 2021

<table>
<thead>
<tr>
<th>Campus</th>
<th>Student Enrollment</th>
<th>Building Square Feet Total Area</th>
<th>Building Square Feet per Student</th>
</tr>
</thead>
<tbody>
<tr>
<td>High Schools</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Brien McMahon</td>
<td>1,978</td>
<td>130,394</td>
<td>76</td>
</tr>
<tr>
<td>Norwalk</td>
<td>1,948</td>
<td>310,000</td>
<td>210</td>
</tr>
<tr>
<td>Total – High Schools</td>
<td>3,926</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Middle Schools</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>West Rocks</td>
<td>737</td>
<td>100,650</td>
<td>137</td>
</tr>
<tr>
<td>Ponus Ridge STEAM Academy</td>
<td>668</td>
<td>104,365</td>
<td>156</td>
</tr>
<tr>
<td>Nathan Hale</td>
<td>599</td>
<td>98,505</td>
<td>164</td>
</tr>
<tr>
<td>Roton</td>
<td>585</td>
<td>98,390</td>
<td>168</td>
</tr>
<tr>
<td>Total – Middle Schools</td>
<td>2,589</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Elementary Schools</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kendall College and Career Academy</td>
<td>481</td>
<td>55,966</td>
<td>116</td>
</tr>
<tr>
<td>Rowayton</td>
<td>475</td>
<td>62,889</td>
<td>132</td>
</tr>
<tr>
<td>Silvermine Dual Language</td>
<td>466</td>
<td>48,626</td>
<td>104</td>
</tr>
<tr>
<td>Jefferson</td>
<td>456</td>
<td>60,625</td>
<td>133</td>
</tr>
<tr>
<td>Tracey Magnet</td>
<td>456</td>
<td>77,000</td>
<td>169</td>
</tr>
<tr>
<td>Cranbury</td>
<td>431</td>
<td>60,043</td>
<td>139</td>
</tr>
<tr>
<td>Brookside</td>
<td>423</td>
<td>68,727</td>
<td>162</td>
</tr>
<tr>
<td>Marvin</td>
<td>399</td>
<td>56,800</td>
<td>142</td>
</tr>
<tr>
<td>Fox Run</td>
<td>371</td>
<td>53,336</td>
<td>144</td>
</tr>
<tr>
<td>Naramake</td>
<td>357</td>
<td>54,589</td>
<td>153</td>
</tr>
<tr>
<td>Columbus Magnet</td>
<td>310</td>
<td>49,356</td>
<td>159</td>
</tr>
<tr>
<td>Wolfpit</td>
<td>306</td>
<td>50,560</td>
<td>165</td>
</tr>
<tr>
<td>Early Childhood Center</td>
<td>157</td>
<td>17,295</td>
<td>142</td>
</tr>
<tr>
<td>Total – Elementary Schools</td>
<td>5,088</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: Enrollment from District Enrollment Summaries, 1/1/21; Building Capacity from Facilities Feasibility Study 2015 and Norwalk High School Facility Assessment Updated 2021.

Note: Excludes 68 out of district placements.

1 Includes 1,702 Brien McMahon High School students, 2 NAOP students, and 274 Center for Global Studies students.
2 Includes 1,472 Norwalk High School students, 2 NAOP students, 26 Norwalk 18-21 Next Steps NNS students, 11 Norwalk 18-21 Project SEARCH students, and 437 P-TECH Norwalk students.
3 Includes 122 Early Childhood Center students and 35 Pre-K Special Services Only students.

FINDING

There is inconsistency in implementation of the City’s ordinance for NPS capital building projects related to when the NPS Facilities Team manages construction and renovation projects and when the City manages those projects.

The City ordinance ‘Capital Projects Program’ provides that capital projects in excess of $400,000 are to be managed by the City. Projects below $400,000 are to be managed by NPS. The City owns the school buildings, and the Board of Education is the tenant. For some projects, the City determined that it was more appropriate for NPS facilities staff to implement the projects. However, staff reported that the timing and decisions regarding these shifts was not always planned. As a result, both the City and NPS communicate with the State’s Department of Administrative Services regarding capital projects and the State’s 32 percent state facilities reimbursement process.
In Fall 2021, NPS filled a new Project Manager position to assist with the capital projects. Staff indicated that these projects are implemented through a “gentleman’s agreement.”

**Exhibit 4-5** includes the 16 capital improvement projects that NPS is managing. Of the 16 projects, nine projects are valued above $400,000.

**Exhibit 4-5**
**Capital Improvement Projects – Board of Education**
**FY 2019 through FY 2023**

<table>
<thead>
<tr>
<th>Project Title</th>
<th>Project Number</th>
<th>Project Value</th>
<th>Exceeds $400,000?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jefferson School</td>
<td>C0619</td>
<td>$9 million</td>
<td>Yes</td>
</tr>
<tr>
<td>Columbus School</td>
<td>C0618</td>
<td>$9 million</td>
<td>Yes</td>
</tr>
<tr>
<td>Facilities Master Plan</td>
<td>C0610</td>
<td>$32.65 million</td>
<td>Yes</td>
</tr>
<tr>
<td>BMHS Marine Sciences Pathway Renovation</td>
<td>New</td>
<td>$215,000</td>
<td>No</td>
</tr>
<tr>
<td>Air Conditioning Program</td>
<td>New</td>
<td>$2.5 million</td>
<td>Yes</td>
</tr>
<tr>
<td>Instructional Technology</td>
<td>C0112</td>
<td>$3.517 million</td>
<td>Yes</td>
</tr>
<tr>
<td>Curriculum Materials</td>
<td>C0609</td>
<td>$759,000</td>
<td>Yes</td>
</tr>
<tr>
<td>Capital Repairs and Replacement</td>
<td>C0587</td>
<td>$1 million</td>
<td>Yes</td>
</tr>
<tr>
<td>BMHS IAQ Recommendations</td>
<td>New</td>
<td>$150,000</td>
<td>No</td>
</tr>
<tr>
<td>Kendall Media Center</td>
<td>New</td>
<td>$100,000</td>
<td>No</td>
</tr>
<tr>
<td>School District Paving</td>
<td>C0516</td>
<td>$1.75 million</td>
<td>Yes</td>
</tr>
<tr>
<td>Energy Conservation Program</td>
<td>C0621</td>
<td>$220,000</td>
<td>No</td>
</tr>
<tr>
<td>BMHS Learning Commons Furniture</td>
<td>New</td>
<td>$120,000</td>
<td>No</td>
</tr>
<tr>
<td>District Vehicles</td>
<td>C0623</td>
<td>$75,000</td>
<td>No</td>
</tr>
<tr>
<td>Silvermine Dual Language Expansion</td>
<td>New</td>
<td>$12 million</td>
<td>Yes</td>
</tr>
<tr>
<td>IB Middle Years Program</td>
<td>New</td>
<td>No Amount Listed</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Source: Capital Improvement Projects Board of Education Summary Page, November 2021.

Without adequate planning and preparation, implementing multi-million-dollar projects results in the NPS Facilities Department shifting existing resources to meet the expectations of the projects which increases its total number of projects with the same number of staff.

**RECOMMENDATION**

**Recommendation 4-1:**

Eliminate the $400,000 limit in City ordinance § 30-15.1 for capital construction projects and require the City and NPS coordinate to identify the best division of work based on available resources.

City and NPS facilities staff should eliminate the defined amount for project assignments. With the actual practice for project assignments not adhering to the City ordinance, the ordinance is not necessary. The City and NPS should collaborate on capital construction project assignments during the planning phase to determine the most appropriate assignment based on resources available at the time of the project initiation. As a result, some projects may be managed by the City and some may be managed by NPS without a value limit being the determining factor.
FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

Multiple studies are regularly conducted, but seldom used to solve the deferred facilities maintenance of the buildings.

In 2015, NPS conducted a Facilities Study that identified $77.4 million of deferred maintenance to be addressed within the next 10 years. In 2021, NPS conducted another Facilities Study. The 2021 report stated:

Together, the long-term investments that address enrollment growth, educational adequacy, and facilities conditions needs and best serve and protect the existing assets of the Norwalk community represent approximately $429-495 million of investments over the next 20 years ($21-25 million per year).

NPS has engaged in multiple studies and evaluations. The NPS Facilities Department may be a participant in some, but not all the evaluations. However, NPS and City facilities staff both indicated that at least for the facility studies, the reports are “put on the shelf” and not used as solutions for where and how to improve maintenance of the buildings.

As a result, the buildings continue to age with only a “bandaid” approach to maintenance, according to some staff. Other than large capital projects, the Facilities Department conducts maintenance work based on requests from campus and building staff.

Effective organizations tackle deferred maintenance as part of their regular maintenance routine. Facility Executive, a specialized trade publication for facility executives in all industry and service sectors, cites the following eight strategies to assist with this process:

- conduct an audit of current maintenance processes and projects;
- log maintenance activities in building infrastructure software;
- leverage software to centralize work orders;
- prioritize your list of backlogged maintenance tasks;
- strengthen your team’s preventive maintenance program;
- conduct a life-cycle cost analysis on critical pieces of equipment;
- work with your financial team to secure additional funding, if needed; and
- educate yourself on the industry’s latest preventive maintenance techniques.

Exhibit 4-6 includes seven reports provided to the Evergreen Team. The reports are dated from 2013 to 2021. Each of the reports have many facilities-related findings and recommendations.
### Exhibit 4-6

**Facilities Recommendation Examples**

**February 2013 through March 2021**

<table>
<thead>
<tr>
<th>Report Name and Details</th>
<th>Number of Findings and Recommendations</th>
<th>Examples of Findings</th>
</tr>
</thead>
</table>
| A Framework for Decision Making, Norwalk Facilities Plan Study 474 pages March 2021 Author: Newman and DLR Group | A total count is not provided in the report, but the majority of the 474 pages highlights facility-related findings and recommendations. | • Security: Many campuses lack secure vestibules with a check-in point and entry into the front office.  
• Paint/Flooring/Acoustic Ceiling Updates: Several campuses have finishes that are dull and past their useful life.  
• Interior Mesh Shading Systems and Exterior Sunshades: Most classrooms do not have appropriate daylight and views. The exterior windows let too much direct sunlight into the rooms so occupants use solid roller blinds.  
• Lighting: Most of the lighting is fluorescent fixtures. This type of lighting is poor quality, lacks dimming capabilities, uses more energy, and has a loud humming noise that is disruptive.  
• Indoor Air Quality: The HVAC systems do not meet current standards for indoor air quality. Some campuses lack a ventilation system to bring fresh air into classroom spaces. |
| Norwalk Public Schools Customer Service Review 33 pages Spring 2020 Author: 3DimensionED, LLC | N/A – Text only, no counts | • Visitor parking – location, allocation, and signage  
• Some poor security and open access into campus |
| ADA Accessibility Survey of 10 Norwalk Schools 70 pages August 2019 Author: Melissa Marshall Disability Policy Consulting, LLC | 242 | • No designated van-accessible parking spaces  
• Noncompliant slope and grate  
• Broken pavement  
• Absence of lowered counters  
• Heavy door pressure weight  
• Lack of accessible cafeteria seating |
| Site Summary Results (regarding overall access into building and customer experience), 19 pages April 2019 Author: The Flipping Point | N/A – Text only, no counts | • No parking signage; no visitor parking  
• Faded parking spaces  
• No signage for entrance  
• Dented and damaged entryway  
• Rust and peeling paint  
• Outdated event signage  
• Trash on grounds  
• Visitor areas not clean |
| Security Feasibility Study 94 pages December 2016 Author: D’Agostino & Associates | 513 (76 Access, 228 Intrusion, 209 Surveillance) | • Poor access controls  
• Little intrusion detection  
• Incomplete video surveillance and systems |
| City of Norwalk School Facilities Study 316 pages March 2015 Authors: Silver/Petrucelli+Associates, Inc. and Milone & MacBroom | A total count is not provided in the report, but the majority of the 316 pages highlights facility-related findings and recommendations. | • Exterior Facility and Site Conditions: Peeling paint; roof leaks  
• Interior Facility Condition: Damaged sheetrock walls; courtyard without two means of egress  
• Plumbing and Fire Protection Systems: Electric water heater has five years of remaining useful life  
• Mechanical Systems: Poor toilet room ventilation; water stains from finned tube radiation in gym  
• Electrical Systems: Lighting fixture with broken lens; no illuminated exit sign over egress door |
| Americans with Disabilities Act Self-Evaluation: Compliance and Transition Plan 91 pages February 2013 Author: Independent Living Resources | 215 | • No van accessible parking spaces  
• No access routes from parking and walkways  
• Noncompliant handrails on ramps and stairs  
• Noncompliant walkway grades  
• Toilet seats too high  
• Noncompliant towel dispensers |

Without reviewing and incorporating facilities-related recommendations into the regular maintenance tasks, these long-standing deferred maintenance issues may never be fully addressed.

**RECOMMENDATION**

**Recommendation 4-2:**

Incorporate the facilities maintenance recommendations from facilities and other studies into the maintenance work schedule.

NPS should review the existing reports, studies and reviews that have any facilities-related recommendations. On a monthly basis, the Facilities Department should flag the recommendations that could be incorporated as an additional maintenance task.

**FISCAL IMPACT**

No fiscal impact is assumed, as the fiscal impact cost for this recommendation is included as part of **Recommendation 4-5** which recommends an alternate solution for managing facilities maintenance services.

### 4.1.2 Facilities Infrastructure and Services

NPS maintains 18 school buildings. The 2021 Facility Study assessed the NPS campus facilities condition assessment and educational adequacy. For the Facilities Condition Assessment, each campus received an assessment from three perspectives – architectural, building systems and food service. The following is the rating system used:

- **A**=Excellent: No visible defects, new or near new condition, may still be under warranty if applicable.
- **B**=Good: Good condition, but no longer new, may be slightly defective or deteriorated, but is overall functional.
- **C**=Adequate: Moderately deteriorated or defective but has not exceeded useful life.
- **D**=Marginal: Defective or deteriorated in need of replacement; exceeded useful life.
- **F**=Poor: Critically damaged or in need of immediate repair; well past useful life.

NPS and each facility also received an overall Educational Adequacy Analysis. The following components were included in the scoring analysis:

- Community Resource: Culture, Community Connections & Wayfinding
- Stimulating Architecture: Performance & Condition of Physical Space
- Safe and Secure Supervision and Security: Safety, Security & Site Functionality
- Learning Environments that Connect: Real-World Experiential Learning
- Flexibility: Flexible Space, Accommodations, Utilization & Adaptable Furniture for Day-to-Day Use and Over Time

The Educational Adequacy score is based on a range of 0-5 using the following rating system.

5.00=Functions excellently
4.00=Functions well/good enough condition to support educational needs
3.00=Functions/condition is okay, but could be better to support educational needs
2.00=Exists; baseline functionality; does not support educational needs
1.00=Does not exist/needs to be replaced

NPS received an overall Educational Adequacy score of 3.17.

Exhibit 4-7 shows the campus facilities condition assessment and the educational adequacy total score. For the facilities condition assessment, no campuses received an A, six received a B, and nine received a C or D. For educational adequacy, most campuses received a score in the range of more than 2.00 to more than 3.00.

**Exhibit 4-7**
Campus Facilities Condition Assessment and Educational Adequacy Total Score
March 2021

<table>
<thead>
<tr>
<th>Campus</th>
<th>Facilities Condition Assessment</th>
<th>Educational Adequacy Total Score Max Score: 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>High Schools</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Brien McMahon</td>
<td>B</td>
<td>3.81</td>
</tr>
<tr>
<td>Norwalk</td>
<td>Not Rated</td>
<td>3.13</td>
</tr>
<tr>
<td>Middle Schools</td>
<td></td>
<td></td>
</tr>
<tr>
<td>West Rocks</td>
<td>B</td>
<td>2.91</td>
</tr>
<tr>
<td>Ponus Ridge STEAM Academy</td>
<td>Not Rated</td>
<td>3.85</td>
</tr>
<tr>
<td>Nathan Hale</td>
<td>C</td>
<td>2.61</td>
</tr>
<tr>
<td>Roton</td>
<td>C</td>
<td>2.89</td>
</tr>
<tr>
<td>Elementary Schools</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Kendall College and Career Academy</td>
<td>B</td>
<td>3.12</td>
</tr>
<tr>
<td>Rowayton</td>
<td>C</td>
<td>3.05</td>
</tr>
<tr>
<td>Silvermine Dual Language</td>
<td>C</td>
<td>3.04</td>
</tr>
<tr>
<td>Jefferson</td>
<td>Not Rated</td>
<td>3.55</td>
</tr>
<tr>
<td>Tracey Magnet</td>
<td>B</td>
<td>3.02</td>
</tr>
<tr>
<td>Cranbury</td>
<td>Not Rated</td>
<td>3.73</td>
</tr>
<tr>
<td>Brookside</td>
<td>B</td>
<td>3.44</td>
</tr>
<tr>
<td>Marvin</td>
<td>C</td>
<td>2.68</td>
</tr>
<tr>
<td>Fox Run</td>
<td>C</td>
<td>3.23</td>
</tr>
<tr>
<td>Naramake</td>
<td>C</td>
<td>2.37</td>
</tr>
<tr>
<td>Columbus Magnet</td>
<td>C</td>
<td>2.29</td>
</tr>
<tr>
<td>Wofford</td>
<td>D</td>
<td>2.76</td>
</tr>
<tr>
<td>Early Childhood Center</td>
<td>B</td>
<td>3.49</td>
</tr>
</tbody>
</table>

FINDING

The Facilities Department has custodian floaters to continue to keep the campuses clean when there is absent staff.

NPS has a total of 120 custodians cleaning its 18 school buildings. Of the total, 70 positions are employed by Affinico, NPS custodial contractor. The remaining 50 custodians clean and maintain the five campuses that are not part of the custodial contract. The five campuses include:

- Norwalk HS;
- Brien McMahon HS;
- Nathan Hale MS;
- Cranbury ES; and
- Naramake ES.

During times of absence, the expectation continues that the school campuses should be cleaned. Like having substitute teachers who are available to fill in for absent teachers, NPS has 12 custodian floaters to fill in for any vacancies from the 50 custodial staff in the five campuses.

NPS has hired the custodian floaters, and they are paid only if they fill in for an absent custodian. To avoid downtime with ensuring the campuses are cleaned, NPS recruits them through Applitrack. The Facilities Department interviews and hires the applicants. They ensure that all the required background and fingerprinting has been conducted. When there is a custodian vacancy in one or more of the five campuses, the Department reaches out to the floaters, resulting in a more efficient process to get the work completed.

COMMENDATION

The Facilities Department has custodian floaters to continue to keep the campuses clean when there is absent staff.

FINDING

The Facilities Department estimates that more than 4,000 work order requests are not submitted through the Workspeed facilities work order system.

NPS annually pays $10,000 for Workspeed, but staff report that it includes only about 30 to 40 percent of the work conducted. NPS leaders often call, text, and email the Facilities Department about maintenance issues that they want managed immediately. The Facilities Department does not require the leaders to add the requests into Workspeed. Department staff report that they add these work orders into assignments that need to be managed for the day, but work orders are often not added into Workspeed. As a result, the Facilities Department leadership often shift the work that has already been assigned to the maintenance staff. The staff may enter these into Workspeed, but they reported that this often does not occur.
With this practice being allowed, the management positions who call, text and email with additional requests have little incentive to stop using these communication methods. The result is that assigned staff are more inefficient during the workday with their travel, supplies and tools they need to conduct the work. Without all the work orders included in the system, the Department cannot prioritize the work, and the use of the system declines. This action prevents management from using Workspeed reports to evaluate workload since it is incomplete.

**Exhibit 4-8** shows the completed Workspeed work orders for FY 21 by campus. As can be seen, Norwalk High School had the largest number of requests with 278 requests, while Jefferson Elementary had the least number of requests with 15 requests. The average number of requests was 271 for the high schools, 126 for the middle schools, and 72 for the elementary schools.

![Exhibit 4-8 Workspeed Work Orders - Completed Requests FY 21](image)

The Facilities Department estimates that about 4,000 work orders annually are never included that came from calls, texts, and emails. With the 1,909 requests cited in **Exhibit 4-8** above, there are almost 6,000 annual work orders. Without requiring all work order requests to be posted to Workspeed, the total amount of work is not known, and the tool is not effective.

A key benefit that Workspeed mentions for the use of its product as a tool is to ensure that “requests do not slip through the cracks.” Not requiring all work orders to be in the system allows requests to slip through the cracks. Not having all the work orders entered results in a lost opportunity to prioritize the work.
RECOMMENDATION

Recommendation 4-3:

Require all work orders to be included in the Workspeed work order management system and prioritize based on a rating system that ranks health and safety issues above all other requests.

The Department should inform all users of the expectation. The Department should define what constitutes an emergency work order, communicate this to all users and ensure that emergency work orders are handled as priority assignments. Work order requests that are not emergencies should be considered along with all other existing requests.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The description of the Facilities Maintenance request in Workspeed is not detailed and the use of the system is inefficient.

Exhibit 4-9 lists the 12 fields that are in Workspeed. Of the 12 fields, the requestor enters information or chooses from the drop-down menu for seven (7) fields, the majority of the work order. The system generates a response for three fields, and the maintenance staff enter information for two fields.

<table>
<thead>
<tr>
<th>Workspeed Field</th>
<th>System Automatically Generates</th>
<th>Requestor Enters Information or Selects Choice</th>
<th>Maintenance Staff Enters Information or Selects Choice</th>
</tr>
</thead>
<tbody>
<tr>
<td>Campus Name</td>
<td></td>
<td>X</td>
<td>X</td>
</tr>
<tr>
<td>Location: Building</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Location: Floor</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Location: Suite</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>ID#</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Request Type (Other, Maintenance, Plumbing, Equipment, Lighting, Leak, Electrical-Power, etc.)</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Location Details</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Description</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Work Summary</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Charge Type</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Created</td>
<td></td>
<td>X</td>
<td></td>
</tr>
<tr>
<td>Closed</td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

School principals and secretaries often do not include sufficient information in the work order request. They may not know the information to include in the appropriate fields. Information is often left blank or incomplete. The key information on why a visit is needed is the type of request because this determines which trade (electrician, plumbing, and HVAC) will receive the assignment. The Facilities Department reported that the “Other” category in Workspeed comprises more than 50 percent of all the requests posted.

Without a complete description of the request, Maintenance staff cannot quickly determine the problem, proposed solution, and tools needed prior to arriving to the building. As a result, multiple repeat visits may be required by staff to complete the task. Photos and videos are an option in Workspeed, but staff report that it is rarely used.

Campus secretaries may receive information from teachers and the head custodians with a request for the secretary to add into Workspeed. Facilities Department staff provide training to staff as needed, but this training has not resulted in more complete information. Without adequate information, Maintenance staff often first investigate the problem and then return to fix the problem—an inefficient practice.

Work order assignments distributed to staff are not organized by campus. Staff reported that sometimes more than one Maintenance employee may be in the same building without knowing the other is there. Staff receive a travel stipend to drive their own vehicles, but on average, they reported sometimes driving to many campuses in a day rather than a more concentrated schedule to conduct all the work orders in the same building while staff are already there. They reported spending much of the workday in the car driving around the City, rather than conducting the maintenance work.

Maintenance staff indicate that district-issued cell phones lack the appropriate authorization or settings to allow the phones to quickly access the campus network and Workspeed application. Without good cell reception, staff cannot quickly examine the request details upon arrival. Staff reported that without uninterrupted cell phone access to the Workspeed application, they cannot efficiently conduct the work and closeout the work order. The app and/or the phone sometimes shuts down completely or continually searches for a connection.

Without an efficient use of the Workspeed system, the limited number of Maintenance staff are not maximizing their time to solve the maintenance issue. Workspeed is designed with two primary entry points for a description, including “Location Details” and “Description.” Effective user training programs provides explanation and examples of the key differences in these Workspeed categories.

**RECOMMENDATION**

**Recommendation 4-4:**

Improve management of the Workspeed Maintenance Work Order System to maximize the efficient use of the system.
The Facilities Department should identify opportunities to use the work order system’s features and benefits. To continue to increase the efficiency of the maintenance staff, the Facilities Department should provide more explanation and consider more training with campus staff and other users regarding the type and level of information they are posting to Workspeed.

The Facilities Department should assign work orders by skill and by campus to allow the time on task to be more efficient, resulting in less time driving between campuses for the staff.

The Department should coordinate with the IT Department and the cell phone provider to evaluate the cell phone accessibility issues to ensure a smoother process for maintenance staff.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING**

NPS facilities are not efficiently maintained. The number and deployment method for Facilities Maintenance staff are not consistent with the amount of work to be accomplished.

As previously stated, the Facilities Department estimates that about 4,000 work orders annually are never included that came from calls, texts, and emails. With the 1,909 requests cited in Exhibit 4-8, previously, there are almost 6,000 annual work orders.

NPS employs five maintenance staff, including two plumbers, two HVAC, and one electrician. With 6,000 work orders and five staff, if all the types of requests were of equal proportion, each maintenance staff would be assigned 1,200 work orders per year.

The industry standard in American School and University M&O Cost Study is one maintenance staff to 107,439 square feet. Based on 1.5 million square feet cited in Exhibit 4-8, the number of maintenance staff would be 14 staff—a difference of nine staff as compared to the standard.

The 2021 Facilities Study noted that NPS should invest $429-495 million over the next 20 years ($21-25 million per year). Staff reported that the number of positions has decreased in the past few years, while the number of buildings to maintain has increased and they have aged—increasing the amount of maintenance needed. Principals confirmed that there is not typically enough Maintenance staff to complete the work.

Conducting maintenance tasks only during the school day is not efficient. Many tasks cannot be completed while students and staff are present in the building. All staff have the same daily schedule of 7:00 am to 3:30 pm, and the collective bargaining agreement provides that the workday ends at 3:30 pm, so no staff work in the evenings when the building is vacant. Some tasks can be completed prior to students and staff arriving to school. Staff reported that they often arrive to the building to complete work orders and learn that the work cannot be completed while anyone is present—resulting in additional scheduling inefficiencies.
Communication with principals regarding maintenance tasks to be conducted in the building does not occur regularly. Without some type of notification, the principals may have educational programming that conflicts with the completion of an assigned work order. Staff reported that they may learn about a conflict with their ability to complete the work order after traveling to the building. As a result, Facilities staff may not be able to complete the work.

In comparison, in 2012, when the NPS custodial operations experienced challenges, NPS shifted how the program was managed. Staff reported that in 2012, NPS renegotiated the collective bargaining agreement. At that time, NPS received the right to outsource with the requirement that staff would not be terminated. As a result, in 2014, NPS began shifting its custodial function to a contracted service model for labor through staff retirement and attrition. NPS will continue contracting for its custodial operations until all the campuses are managed by the contractor. NPS continues to purchase custodial supplies.

In contrast, the City contracts for the facilities and building management of all City buildings in Norwalk.

RECOMMENDATION

Recommendation 4-5:

Contract for facilities maintenance services for all NPS buildings.

The Facilities Department should replicate the process used to contract for custodial operations for its maintenance operation. The Department should coordinate with the City regarding its facilities and building management contract to identify opportunities for consistency and require that the contractor make better use of the current system or provide a robust work order management system to implement a coordinated preventative maintenance and prioritized break-fix program.

FISCAL IMPACT

Assuming the same number of break-fix work orders, a minimum of 2,000 contract hours should be dedicated to preventative maintenance activities and an additional 4,000 contract hours to address more comprehensive maintenance activities. Assuming a general hourly rate of $75 per hour, this fiscal impact assumes an initial contract cost of roughly $450,000 annually (6,000 hours x $75 an hour). As positions are vacated, the contractor should assume additional duties.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contract for Facilities Maintenance Services</td>
<td>($450,000)</td>
<td>($450,000)</td>
<td>($450,000)</td>
<td>($450,000)</td>
<td>($450,000)</td>
</tr>
</tbody>
</table>
FINDING

NPS does not maintain an inventory count and value of the items stored in the Briggs Building.

The Department uses the old Briggs Building as a storage location for maintenance parts and custodial supplies. They do not have a maintenance warehouse. NPS contracts for custodial labor, but purchases and provides custodial supplies. Each Monday, Facilities Management receives an order from the head custodian for the campuses that contract for custodial services. Vendors deliver the supplies to the Department, and the truck drivers deliver to the campuses. The Department does not maintain an inventory of what has been ordered, what has been received, and what has been distributed to the campuses.

The Maintenance staff retrieve what they need to conduct their work without recording what they have taken from the storage location. The Facilities Department reorders, as needed, based on experience rather than based on an inventory report. Staff report that the items stored in the Briggs Building have an average total value of about $10,000.

Without adequate controls, the risk of loss and theft of supplies is high. The Association of Government Accountants recommends that controls must be in place to account for governmental inventories. Receiving records should be validated against deliveries. Materials should be stored in secured areas. Frequent physical inventories may be necessary and annual inventories are generally required. There should be adequate segregation of duties between receiving, payment processing, and inventory reconciliation.

RECOMMENDATION

Recommendation 4-6:

Identify, record, and regularly inventory the supplies stored in the Briggs Building, and explore other options for a warehouse with improved security of the stored items.

The Facilities Department should include the items that are added and deducted for use by staff. The Department should conduct a monthly inventory check of the stored items.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

School building room keys are not efficiently managed.

There is a risk that access to some rooms may be possible by staff who are no longer employed by NPS or who have changed campuses. The information provided to the Evergreen Team was not consistent. The Facilities Department reports that they have provided each Principal two keys for each room in the building along with spare keys. They said that with each new employee,
Principals request more keys and do not have the original keys. Campus staff routinely submit work orders regarding requests about physical keys.

Some Principals indicated that the Facilities Department has not provided keys to all the rooms when the rooms were rekeyed. Principals stated that some rooms cannot be locked because there is not a key.

Without effective key management, the safety and security of some rooms in the building may be at an increased risk. An industry best practice for facility administrators is to decentralize key administration. Housing keys where they are needed in the campus, without needing an intervention from the Facilities Department, will strengthen the efficiency of the process and will reduce the frustration by all staff involved.

**RECOMMENDATION**

**Recommendation 4-7:**

**Assign key management to Principals to ensure control for the rooms in their building.**

The Facilities Department reported that they have developed this initiative and will be implementing it in April 2022. The Department has inventoried the boxes of keys and they found two boxes missing. They have purchased a machine to cut their own key, eliminating the requirement to obtain new keys from vendors.

During the implementation, the Department should be removed from any role in key management. Principals can determine the key assignment and management process that works for each campus.

The Facilities Department and each building leader should conduct an inventory of all the existing keys for each room in each building. The Department should obtain a key for any rooms where a key does not exist.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING**

Procedures and maintenance-related metrics are not incorporated in the Facilities Department.

Staff use various memos, notes and “tribal knowledge” about how to conduct their work, along with their experience, but expectations and how the work is conducted is not recorded. Without documented procedures, NPS risks increased inefficiency when there are shifts in positions to not have a base guideline of how to perform each job. For example, with the maintenance trades staff including plumbers, HVAC and the electrician, as licensed positions, there are expectations of their knowledge. The leaders expect consistency in the practice conducting the maintenance.
However, without recorded procedures, the staff may complete the job in whatever manner they deem is appropriate.

Staff are not evaluated for their performance in implementing assigned work orders during the year. Department management does not define expectations or measure performance against those expectations. NPS does not provide expectations and training for strategies that supervisors should be expected to follow when supervising staff. For example, once Maintenance staff are assigned work orders to complete, if they cannot be completed the day of the assignment, the work orders just stay in the system. There is not a defined number and expectation of work to be completed daily.

Procedures regarding communication, with groups in the campuses about facilities improvements is limited. Staff reported that parent teacher groups and others who may purchase, donate, or improve the facilities may result in increased facilities maintenance costs. Some examples mentioned include purchasing non-commercial grade snowblowers, applying different paint colors with different durability levels, and not knowing where key sensors and thermostats are located and painting over them. Once these items are in place, the Maintenance Team is expected to manage the updates.

There are limited procedures regarding communication about new construction projects. The City owns the school buildings and manages the construction projects. The Facilities Department manages the maintenance. There is little communication at the beginning of the construction projects regarding the type of systems and infrastructure being placed, and the location of all the key controls. With different contractors and different buildings, there is not necessarily a consistent approach. Staff reported inefficiencies as they are not regularly informed and must learn about the system when there is a workorder requested on a system.

Staff reported that NPS does not provide regular training to Facilities Maintenance staff and lacks a Safety Manual. Licensed trades staff are expected to maintain their own training to keep their license current. Staff reported that some training occurs during the year. Without requiring safety-related training, NPS may be liable if it has not conducted training, and staff conduct their work in an unsafe manner. Staff reported that the City has a safety committee for its staff, but NPS does not have such a committee.

Without documented procedures, including expected safety practices, the Department is at an increased risk when experienced staff depart. There is a risk that the Department will become inefficient as staff will be unaware of many of the duties the vacating staff have been performing.

Effective organizations document their procedures and practices to ensure continuity and avoid disruption of the department. SHRM’s organizational toolkit cites that there are many ways to communicate procedures, but handbooks are still the best way to deliver a consistent message to all employees with respect to standard operating procedures. Work order performance data are often a component of expected procedures. Best practice is to measure and monitor what leadership needs to know to effectively manage the organization. Exhibit 4-10 show types of work order maintenance metrics.
Exhibit 4-10

Work Order Maintenance Metrics

<table>
<thead>
<tr>
<th>Sample Work Order Maintenance Metrics</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency Repairs as a Percentage of Scheduled Hours</td>
</tr>
<tr>
<td>Planned and Scheduled Work Completion Rate</td>
</tr>
<tr>
<td>Preventive Maintenance Hours as a Percentage of Total Work</td>
</tr>
<tr>
<td>Maintenance Overtime as a Percentage of Maintenance Time</td>
</tr>
</tbody>
</table>


The U.S. Department of Labor Occupational Safety and Health Administration (OSHA) provides a free field safety and health manual. The 290-page document provides information in 26 chapters to assist departments with compliance and safe practices for all staff.

RECOMMENDATION

Recommendation 4-8:

Develop a Facilities Department Procedures and Safety Manual.

The Facilities Department staff should review the existing informal processes to develop a Procedures Manual. The staff should review and annually update it. As part of the procedures, the Department staff should coordinate with the City to increase communication about new construction project key infrastructure components of the building. This will increase the efficiency of the maintenance staff and will allow them to provide improved customer service. The Facilities Department should identify work order maintenance metrics to include as part of the procedures.

Department staff should regularly coordinate with Principals prior to approving any changes in the building that will be maintained by the department in the future.

Finally, the Facilities Department should develop a Safety Manual and require safety-related training for all facilities maintenance staff. The Facilities Department should coordinate with the NPS Risk Manager and the City’s Safety Committee to identify topics and to determine if there are opportunities to share resources.

FISCAL IMPACT

No fiscal impact is assumed for this recommendation. Since the Facilities Department reported that some training does occur, the fiscal impact assumes that the Department will use its existing budget.

4.1.3 Collaboration With the Parks and Recreation Department

The NPS Facilities Department coordinates with the City’s Parks and Recreation Department on a regular basis. The departments have a shared role with maintaining the exterior areas of the campuses with NPS maintaining grounds within 25 feet of the school buildings and the City maintaining the remainder of the property, including athletic fields and facilities. They also have a dual role with facility rentals. NPS manages rental of the interior of the building while Parks and Recreation manages the exterior rentals.
FINDING

The practice for NPS to maintain 25 feet around the school buildings and for the City to maintain the remainder of the property is not documented and some effort is required to ensure better coordination of effort.

City staff report maintaining more than 90 percent of the outside areas for the 18 campuses; however, City staff are not informed about student testing and other critical schedules where noisy outside maintenance work could impact student success.

NPS contracts for the custodial labor in 13 campuses and purchases the supplies. The custodial services for the other five campuses are conducted by custodian staff employed by NPS. NPS has not identified the amount of time it takes for either the contracted custodians or the employed custodians to clean the 25 feet around all the NPS buildings. Snow removal was also cited as an issue, with school staff clearing snow and City staff clearing roadways. In some instances, the snow is blown back onto school walk-ways during the street clearing process making double work.

While the practice is working for the most part, documenting the expectations and opening lines of communication could be beneficial.

RECOMMENDATION

Recommendation 4-9:

Document the 25-foot maintenance requirement with the City and open lines of communication regarding special needs and areas where better coordination will benefit both groups.

NPS and the City should work together to identify the key maintenance needs both within the 25-foot area and the surrounding grounds, and document the agreement for maintenance of both areas, including ways to expand the communication on key testing dates and other special needs to include Parks and Recreation staff.

Establishing common goals and objectives for the maintenance requirements and opening lines of communication is vital for both organizations.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

NPS and the City have inconsistent requirements for patrons to rent school and City facilities. The NPS Facilities Department manages the rental of the interior school building rooms, while areas outside the school buildings after 3 pm are managed by the City Parks and Recreation Department. However, areas outside the school buildings are managed by the campuses up until 2:59 pm. Patrons who rent both inside and outside facilities have multiple inconsistent steps to follow for approval of the rentals.
The facility rental forms for the City and NPS are different. Residents wanting to use both inside and outside the building have an undue burden for the completion of forms and the approval process. Exhibit 4-11 identifies the similarities and differences in the City and NPS facility rental agreements. As can be seen, the rates, insurance, and approvals are not consistent.

### Exhibit 4-11

**Similarities and Differences in the Facility Rental Agreements**

*2021-22 School Year*

<table>
<thead>
<tr>
<th>Topic</th>
<th>City Rental Agreement</th>
<th>NPS Rental Agreement</th>
<th>Similarities or Differences/Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Event Venue Fee Rates</td>
<td>$300-$700 Rentals within 45 days prior to event date</td>
<td>$0-$200 30 days advanced notice</td>
<td>Different rate structure</td>
</tr>
<tr>
<td>Hourly Rental Rates</td>
<td>Each rental is based on either by day or have set 3/4/5/9-hour minimum</td>
<td>2-hour minimum for all facilities</td>
<td>Rates not consistent</td>
</tr>
<tr>
<td>Non-Profit Rate</td>
<td>$200 off rental for Norwalk-based non-profit organizations</td>
<td>$0 Rental Fee for activities for Norwalk children sponsored by non-profit organization/ Reduced Rental Fee for Norwalk-based non-profit organization with cultural or educational value</td>
<td>Non-profit organizations treated inconsistently</td>
</tr>
<tr>
<td>Event Permits</td>
<td>Beach Permit, Electrical Lighting Equipment Permit from Code Enforcement Department, Consumer Protection Liquor Control Division Temporary Permit if alcoholic beverages are sold</td>
<td>Special Event and Business Event Permit due 45 days prior to event (for Liquor)</td>
<td>City requires more permits for liquor</td>
</tr>
<tr>
<td>Insurance</td>
<td>Commercial General Liability $1,000,000; Liquor Liability $1,000,000; Liquor license must be purchased with City of Norwalk as an additional Insured</td>
<td>Certificate of Insurance: Personal Injury Coverage $1,000,000; Property Damage Coverage $1,000,000. Provided not less than 30 days; Commercial General Liability Insurance $1,000,000 with City of Norwalk and the Board of Education as an additional Insured</td>
<td>Both have Commercial General Liability of $1 million. NPS also requires Personal Injury Coverage of $1 million and Property Damage Coverage of $1 million.</td>
</tr>
<tr>
<td>Application Approvals</td>
<td>Parks and Recreation Committee Approval, Common Council approval; Norwalk City Hall/Norwalk Board</td>
<td>Departmental Approvals: Principal; Parks and Recreation Signature; Fire Marshal's Signature if applicable; City Clerk's Signature</td>
<td>Different approvals</td>
</tr>
<tr>
<td>Deposit</td>
<td>$100 non-refundable due 45 days prior retained by the City of Norwalk; Refundable Security deposit for each facility $1,000-$1,500 due 30 days prior</td>
<td>N/A</td>
<td>Inconsistent requirements</td>
</tr>
<tr>
<td>Staff Labor</td>
<td>Renter provides all personnel including lifeguard</td>
<td>Custodian present at all times 3 hour minimum with 15% administrative fee; Custodian required &gt;100 with 15% administrative fee</td>
<td>Staff labor required for NPS facilities</td>
</tr>
<tr>
<td>Equipment</td>
<td>Renter provides all equipment</td>
<td>All equipment included</td>
<td>Different requirements</td>
</tr>
<tr>
<td>Fire Marshal</td>
<td>Open wood burning grill unless permit obtained by Fire Marshal</td>
<td>&gt;125 attendees must obtain Fire Marshall's signature 50 days prior to event</td>
<td>Different rules</td>
</tr>
<tr>
<td>Security</td>
<td>Must be made with Norwalk Police Department if &gt;200 attendees by Renter</td>
<td>Security staff provided for $45/$65 per hour</td>
<td>Not the same security type</td>
</tr>
<tr>
<td>Cancellation</td>
<td>&lt;90 days prior to date nonrefundable; &gt;90 days refundable less the nonrefundable deposit</td>
<td>&lt;10 days written notice nonrefundable</td>
<td>Different number of days</td>
</tr>
<tr>
<td>Extra Fees</td>
<td>$100 fine for Dogs</td>
<td>Permit Fee ($5.00/day); 15% administrative fee to all staff labor; Heat &amp; A/C Fee</td>
<td></td>
</tr>
</tbody>
</table>

*Source: Norwalk Public Schools Facility Rental Agreement; City of Norwalk Facility Rental Agreement 2021.*
Consistent and efficient facility rental processes streamline the process for stakeholders and citizens when they want to rent a space.

**RECOMMENDATION**

**Recommendation 4-10:**

**Develop a consistent facility rental form and process for both the City and NPS.**

The Facilities Department and the Parks and Recreation Department should review the City and the NPS facility rental form. They should identify the similarities and the differences. Where appropriate, both Departments should revise the requirement to adopt a similar practice.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**4.2 TRANSPORTATION**

NPS student transportation is a vital support service to each student’s education. The goal of any school transportation operation is to timely transport students safely to and from school and other school-related activities. Although numerous state regulations govern transportation services, districts have the flexibility of establishing procedures that can enhance operations such as setting bell schedules, designing efficient routes, and establishing sound maintenance procedures.

Connecticut State law requires school districts to provide transportation for all school-age children whenever it is “reasonable and desirable” {CGS 10-220(a)}. In general, this requirement is limited to transportation to public and certain nonprofit, private schools located within the school district or city limits. Out-of-district transportation school districts must provide transportation for students attending state technical high schools and district-designated regional agricultural science and technology centers. The law states:

> Boards of education to furnish, by transportation or otherwise, school accommodations so that each child five years of age and over, and those under age 21 who have not graduated from high school or vocational school may attend public school {CGS 10-186(a)}.

Transportation to non-public schools is permitted in Connecticut under Sec. 10-280a, which states:

> Any local or regional board of education may provide transportation to a student attending an elementary or secondary nonpublic school, not conducted for profit and approved by the State Board of Education, outside the school district wherein such student resides with a parent or guardian, provided such elementary or secondary nonpublic school is located within the state of Connecticut.
There is no difference in laws on transporting students to private schools between religious and nonsectarian schools—either with respect to requirements or state reimbursements.

Although each district is able to set policy, the State of Connecticut provides policy guidelines to each board of education recommending that districts consider (1) a student’s age; (2) the walking distance to school; and (3) the existence of hazardous conditions in developing their policies.

From the NPS public policy statement, transportation is provided based on a family's officially registered address at the school. Transportation is provided for:

- students in Kindergarten through Grade 3 who live more than 1 mile from the school;
- students in Grade 4 through Grade 8 who live more than 1 ½ miles from the school; and
- students in Grade 9 through Grade 12 who live more than 2 miles from school

Eligibility limits are measured from the property line of the family's home shortest distance to the property line of the school, not door to door.

Students are required to be at bus stops 15 minutes prior to the scheduled arrival time; this is to ensure ample time for the routes. A bus can arrive up to 15 minutes after scheduled arrival time and still be considered "on time" at the school.

Within the City limits, NPS provides transportation to:

- 4 high schools (housed on 2 campuses);
- 4 middle schools;
- 12 elementary schools (5 Magnet);
- 1 parochial school (All Saints Catholic School); and
- 1 charter school (within city limits).

NPS is required to provide transportation to the following schools located in Stamford:

- the Vocational Technical School;
- the Vocational Agriculture School; and
- an Intra District Magnet program.

Of the approximately 12,000 students enrolled in NPS, the Transportation Department buses 7,700 regular education students and 350 special needs students (door-to-door). The average scheduled route time is 35 to 40 minutes. High schools are the first pickup, middle school next, and elementary school last. The same pattern is followed in the afternoon.

The NPS transportation budget for 2021-22 is $10 million and covers home transportation for home to school services for general education, special needs, out-of-district special needs—as well as transportation services for magnet, vocational technical, vocational agriculture, parochial, charter and in-district private schools, early dismissals, and state testing/PSAT/SAT.
Exhibit 4-12 shows the NPS transportation actual and budgeted expenditures from Fiscal Year 2019-20 through 2021-22 (budgeted). As shown, transportation costs increased by 11 percent during that time frame while student enrollment declined by 2.6 percent, and eligible student ridership declined by an estimated 1.7 percent. Although ridership declined significantly during the initial stages of the pandemic, the number of students eligible for transportation has consistently remained in the 80 percent range.

Exhibit 4-12
Board of Education Transportation Expenditures
Fiscal Year 2019-20 through 2021-22 (Budgeted)
and BOE Approved Budget for 2022-23

<table>
<thead>
<tr>
<th>Description</th>
<th>Actual 2019-20</th>
<th>Actual 2020-21</th>
<th>Revised Budget 2021-22</th>
<th>% Change 2019-20 to 2021-22</th>
<th>BOE Approved Budget 2022-23</th>
</tr>
</thead>
<tbody>
<tr>
<td>Secretary</td>
<td>$73,032</td>
<td>$75,779</td>
<td>$0</td>
<td>-100.0%</td>
<td>$0</td>
</tr>
<tr>
<td>Aide</td>
<td>$3,959</td>
<td>$0</td>
<td>$0</td>
<td>100.0%</td>
<td>$0</td>
</tr>
<tr>
<td>Non-Affiliated</td>
<td>$0</td>
<td>$0</td>
<td>$90,278</td>
<td>100.0%</td>
<td>$107,625</td>
</tr>
<tr>
<td>Other Non-Certified</td>
<td>$5,570</td>
<td>$0</td>
<td>$0</td>
<td>100.0%</td>
<td>$0</td>
</tr>
<tr>
<td>Overtime Salaries</td>
<td>$22,948</td>
<td>$21,352</td>
<td>$2,263</td>
<td>-90.1%</td>
<td>$0</td>
</tr>
<tr>
<td>Non-Certified Hourly</td>
<td>$0</td>
<td>$4,579</td>
<td>$0</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>Fringe Benefits</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>0</td>
<td>$0</td>
</tr>
<tr>
<td>Social Security</td>
<td>$73,032</td>
<td>$75,779</td>
<td>$0</td>
<td>100.0%</td>
<td>$0</td>
</tr>
<tr>
<td>Other Professional Technical Services</td>
<td>$3,959</td>
<td>$0</td>
<td>$0</td>
<td>100.0%</td>
<td>$0</td>
</tr>
<tr>
<td>Student Transportation Services-Public</td>
<td>$7,956,932</td>
<td>$7,656,736</td>
<td>$8,821,980</td>
<td>10.9%</td>
<td>$9,198,843</td>
</tr>
<tr>
<td>Student Transportation Services-Non-Public</td>
<td>$256,965</td>
<td>$363,560</td>
<td>$399,885</td>
<td>55.6%</td>
<td>$299,723</td>
</tr>
<tr>
<td>Student Transportation Industrial Arts</td>
<td>$8,750</td>
<td>$0</td>
<td>$5,120</td>
<td>-41.5%</td>
<td>$15,120</td>
</tr>
<tr>
<td>Communications</td>
<td>$320</td>
<td>$0</td>
<td>$0</td>
<td>100.0%</td>
<td>$0</td>
</tr>
<tr>
<td>Gasoline</td>
<td>$169,306</td>
<td>$208,292</td>
<td>$108,937</td>
<td>-35.7%</td>
<td>$117,000</td>
</tr>
<tr>
<td>Other Supplies and Materials</td>
<td>$1,775</td>
<td>$1,674</td>
<td>$3,010</td>
<td>69.6%</td>
<td>$3,630</td>
</tr>
<tr>
<td>Lease Payments</td>
<td>$353,501</td>
<td>$358,568</td>
<td>$364,477</td>
<td>3.1%</td>
<td>$371,502</td>
</tr>
<tr>
<td>Dues, Fees and Membership</td>
<td>$350</td>
<td>$350</td>
<td>$350</td>
<td>0.0%</td>
<td>$357</td>
</tr>
<tr>
<td>Grand Total</td>
<td>$8,870,876</td>
<td>$8,717,568</td>
<td>$9,849,698</td>
<td>11.0%</td>
<td>$10,158,925</td>
</tr>
<tr>
<td>Enrollment</td>
<td>11,716</td>
<td>11,579</td>
<td>11,410</td>
<td>-2.6%</td>
<td>9,120**</td>
</tr>
<tr>
<td>Eligible Student Ridership</td>
<td>9,280</td>
<td>6,470*</td>
<td>9,120**</td>
<td>-1.7%</td>
<td>10,120**</td>
</tr>
</tbody>
</table>

Source: Budget extracted from BOE Approved 2021-22 and 2022-23 Budgets; Enrollment data provided by Norwalk Public Schools Public School Information System Reports October 1, 2019, to October 1, 2021; 2022-23. Ridership EDO1 reports to state

* Ridership declines due to COVID-19 remote learning
** Estimated ridership based upon 80 percent of student enrollment

Although the official Transportation Department’s budget shows a projected increase of 11 percent between 2019-20 and 2021-22, during 2019-20 and 2020-21 the Transportation Department underspent their original budgets primarily because the remote learning environment imposed due to COVID-19 reduced the need for school buses. In 2021-22 ridership has increased to near normal rates, resulting in increased costs.
4.2.1 Bus Operations

The NPS Transportation Logistics Administrator is responsible for monitoring school transportation performance as well as routing and scheduling. She is the only non-contractual employee in the NPS Transportation Department. The three contractors that report to the Administrator (Durham, ECS and Relia), provide all the transportation services for the District. Additionally, Hocon reports to the Administrator and provides the propane fuel for the District.

Other management support tools the Administrator uses are:

- Edulog (Student Transportation Management) [https://www.edulog.com/home/](https://www.edulog.com/home/) is used as a student assignment and routing and scheduling tool. Its features include:
  - total integration of route management, planning, reporting, telematics, and parent applications;
  - comprehensive user management capabilities;
  - total seamless integration of optimization and routing;
  - plan and execute alternative schedules;
  - create what-if scenarios to stay prepared;
  - cloud-based web app which means no need for District IT support of either software or hardware; and
  - turn-by-turn directions generated in real time as the planning takes place.

The system also integrates with the student information system to help with planning those eligible for transportation. It has a parent portal (Webquery) that provides parents accurate real time busing information with benefits of instant messaging and alerts, and a two-way communication. Webquery is a service provided through Edulog under an annual service agreement. Web school assistant is another service, but is a read only platform for school staff, who have a username and login password and are able to view students and routes.

**Exhibit 4-13** provides the organization structure of the NPS Transportation function.
Durham School Services is the general education contractor, with a contract that runs for five years (2020-2025). Special education bus operations are provided by Relia Transportation and ECS Transportation companies. Both have had long-term contracts with NPS since at least 2015. All contractors provide their own equipment to meet the needs of the NPS. The number of full-time employees in the contracted transportation services shown in this section are those reported to the State as of November 8th, 2021:

- Durham School Services, L.P, provides in-district transportation using 54 Type I (77 passenger buses) and 10 Type II (18-24 passenger buses). Six (6) of the buses in that fleet are diesel fueled and the remaining 58 are propane fueled. All of the Type I buses were brought into service in August 2020. The Type II buses were brought into service in September 2021. Durham full time equivalent employees (FTE’s) are: 64 drivers, 4 mechanic staff, 3 Front office (General Manager (GM), Operations Supervisor, Shop Supervisor). Odometer readings for the entire regular education fleet, as of October 2021, do not exceed 20,000 miles and the median is in the 12-13,000-mile range.

- ECS Transportation, LLC, provides both in district and one-third of the out-of-district special education transportation services using 11 Type II and 10 Student Transportation
Vehicles (STV) buses. ECS FTEs consist of 11 drivers, 2 mechanic staff, 4 Front office (GM, 3 dispatch). They have responsibility for:

- Special Needs Student Transportation Services for special needs student population during 2021-2022 school year for both in-district and out-of-district programs;
- Provide the vehicles, personnel and equipment required in strict compliance with the terms, standards and specifications set forth in the Agreement;
- Used vehicles currently on the Vehicle Schedule will be removed from service upon reaching 8 years from the manufacture date; and
- Responsible for all other costs necessary for the use and operation of the maintenance facility.

- Relia Transportation, LLC, provides two-thirds of the out of district special education transportation using 14 STV buses. Relia FTEs are 13 drivers, 2 mechanic staff, 3 Front office (GM, 2 support staff). They have responsibility for:

  - Special needs student transportation services for School Years 2021-22;
  - Provide the vehicles, personnel and equipment required in strict compliance with the terms, standards and specifications set forth in the agreement;
  - Used vehicles currently on the Vehicle Schedule will be removed from service hereunder upon reaching 8 years from the manufacture date;
  - Provide the facility for storing the vehicles and absorb all costs associated with providing, maintaining, and operating such facility; and
  - Failure to make a sufficient number of employees available to perform the services required in a skillful, professional, and diligent manner is cause for termination of the agreement.

**FINDING**

NPS rebid the regular education transportation contract in 2020 in an effort to obtain more competitive pricing for transportation services. Durham Transportation came in 6 percent (or $353,000) lower than previous vendor and the contract included new more efficient propane buses.

NPS negotiated a locked in contract with Durham School Services for five years (2020-25) with the option to add another year for a three-year period. The contract contains several features to improve monitoring and driver performance and ensure performance and hold the vendor accountable for providing timely service.

Contract requirements include:

- All vehicles must meet applicable state and federal regulations.
• No vehicle older than 8 years for Type I, and 7 years for Type II and other vehicles, and 100,000 miles.

• All new vehicles must be propane at the start of the contract.

• All Type I and II vehicles shall be equipped with power steering, automatic transmissions, stop alarms, back-up alarms, automatic crossing control gates on the front bumpers and the Child Check Mate brand system (or equivalent) (Check-Mate is an electronic reminder to ensure all children have safely disembarked).

• Route numbers in conspicuous place on bus to ensure the student knows the correct bus.

• Seating only for legal capacity.

• Swing out Semaphore stop signal.

• Equipment for safe and comfortable transportation according to manufacturer's specifications.

• All Type I vehicles have capacity for 77 passengers.

• All Type II vehicles have capacity for 20-24 passengers and equipped with either eight ambulatory and two wheelchair, or five ambulatory and three wheelchair with power hydraulic lifts for wheelchairs.

• Working digital camera monitoring system to monitor behavior on board with cabinets and cameras.

• Maintenance training and continuous improvement methodology under the NPS performance development System (PDS).

• Preventive maintenance with CDL, PM, brake training and air conditioning certs meets AE criteria for blue seal of excellence recognition program.

• Maintenance information portal with technical information and training resources.

• Periodic maintenance safety meetings.

• Test all routes according to the routing plan prior to the opening of school to assure driver familiarity and test traffic patterns.

• To assure driver performance, the vendor also has other tools it may to meet school bus driver regulatory requirements. These include:
  – DriveCam used by Durham for driver training and detects Hard braking, Sudden swerves Rapid changes in speed,
Zonar used by Durham to monitor GPS tracking, fleet inspection, driver attendance, pre/post trip inspection,

Electronic Verified Inspection Routing (EVIR) used as reporting/recording tool within Zonar’s system.

Also under the contract are penalty clauses for non-performance and late performance. These are:

**PENALTIES:** An infraction of an item in these specifications may result in penalties based on the following schedule. The fine will be calculated on a single (3 tier) vehicle rate. Penalties will be charged on a per vehicle and/or per occurrence and/or per day basis.

A multiple for calculating the fine of each violation occurrence follows specification items. (e.g., 1 penalty = $100) Norwalk Public Schools will determine if all contracted obligations are being met: vehicle disablements and accidents may be penalized. The Norwalk Public Schools goal is to provide safe and efficient transportation, not to impose penalties on the contractor. Therefore, the Norwalk Public Schools transportation coordinator will discuss performance issues with the contractor. Penalties will be implemented according to submission of the Bus Report Form from Norwalk Public Schools employees. The superintendent or his/her designee may waive penalties if circumstances dictate.

**LATE PENALTIES:** If the contractor fails to provide a trip as scheduled, Norwalk Public Schools may deduct a sum equal to double the payment due for the service which was not provided from the example above this would be $200. Norwalk Public Schools may require such sum in separate form (e.g., a check) from the contractor. Failure to provide a trip may include repetitive doubled runs, deviations from established routes and failure to make established stops. A deviation of more than fifteen (15) minutes from the regular established schedule shall constitute a failure to provide the trip. This is monitored by the school monitored by the contractor and the school monitors receiving buses at the school and sending them off in the afternoon.

**COMMENDATION**

By renegotiating the contract for regular education transportation, NPS has implemented accountability standards for the vendor to ensure performance and offer students and parents higher levels of service.

**FINDING**

Currently there is no one to provide the NPS Transportation Program support should the current Administrator be out for an extended time or move into another position.

The Transportation Logistical Administrator is currently the only NPS employee engaged in managing the transportation contracts, as well as the routing and scheduling of the daily routes to
and from schools, busing for special events, and the busing of students to magnet school in and out of the District.

The Administrator uses the Edulog tool to make routing decisions based on a three-tiered bell system and deals with students, parents and school administrators on a daily basis. The incumbent has been with NPS for 25 years and has institutional knowledge from her many years of service and the combination of management and technology related expertise and her knowledge of the District operations and the City streets may be difficult to find in someone who has not spent time with the program. NPS has recognized the need and have decided to cross train the Food Services Administrator, who also manages a partially contracted service, and the Transportation Administrator to provide backup for both programs. While this may provide a stop gap measure for short-term absences, fully training an individual on the routing processes in Edulog and educating them on the nuances of the City traffic patterns may not be possible with someone who has a full-time job overseeing Food Service.

Succession planning begins with documentation of processes and procedures, and then passing that information on to someone over time as they put those procedures into practice.

**RECOMMENDATION**

**Recommendation 4-11:**

Hire an Associate or Assistant to work with the Transportation Logistics Administrator and document the processes and procedures as the individual is trained.

Dividing the work responsibilities between the regular education and other contract services would allow each person to focus attention on an area of the transportation operation while still cross-training on the overall function. In addition to providing coverage for the Administrator, documenting the processes will preserve the institutional knowledge held by the Administrator and to ensure that parents and schools receive the most current and timely information possible, even when the Administrator is absent.

**FISCAL IMPACT**

Depending on the determination by management regarding the position title, the salary could vary. For estimating purposes, Evergreen is estimating a salary of $70,000 annually, with 30 percent NPS benefits for a total annual cost of $91,000.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hire a Transportation Assistant or Associate</td>
<td>($91,000)</td>
<td>($91,000)</td>
<td>($91,000)</td>
<td>($91,000)</td>
<td>($91,000)</td>
</tr>
</tbody>
</table>

**FINDING**

During the interim between transportation contracts in 2020, NPS used the opportunity to transition to cleaner, quieter, propane powered school buses to reduce hydrocarbon emissions.
Fifty-eight (58) environmentally friendly buses were put into operation at that time. Now the District has 64 propane fueled buses, 54 Type I and 10 Type II.

NPS has two 1,900-gallon propane tanks on site with an electronic fueling pump which was installed August 2021. From August 2020 – August 2021 NPS had a temporary tank on site. The contractor, Hocon makes the fuel drop as needed, but generally twice a week. Hocon bills the Board of Education directly for the fuel. Fuel usage for calendar year 2021 was nearly 192,000 gallons @ $0.37/gallon for a total cost of $71,000.00. The other two special education contractors, (ECS and Relia) use diesel or gasoline-fueled buses, and they are responsible for maintaining and fueling their own vehicles.

NPS was recognized by other school districts around the country for this forward-thinking effort and received the small private fleet Green Bus Fleet Award from School Transportation News in affiliation with the National Renewable Energy Laboratory. As shown in Exhibit 4-14, the notice that appeared in the School Transportation News in May 2021, states:

*The small private fleet award goes to Durham School Services and the Norwalk Board of Education in Connecticut, where all 65 of the school buses are powered by propane. The conversion from diesel began last spring. The underground fuel tanks were removed with a plan to install two 1,990-gallon, above-ground storage tanks on site this summer.*

**Exhibit 4-14**

NPS Green Bus Summit Fleet Award

![Award Certificate](image)

*Source: School Bus Transportation News, May 2021.*

**COMMENDATION**
NPS was recognized by the National Renewable Energy Laboratory for converting its buses from diesel to propane and trailblazing the implementation of clean fuel.

### 4.2.2 School Bus Routing and Scheduling

NPS uses a staggered bell schedule to control costs by reducing the need for additional buses and drivers. However, an adjustment to the bell times recommended by an outside consultant in 2019 did not include a study of traffic patterns and when fully implemented led to congestion and late bus arrivals at the beginning of the 2021-22 school year.

The sequence of events included:

- In 2018, NPS hired a consultant to study the bell times and its effect on transportation. The bell time study committee (which did not include school principals) studied school starting times and implemented a modified staggered schedule to be used for school starting in September 2019 for the 2019-20 school year.

- During January-February 2020 routes were created and dry runs were conducted to 'test' the new schedules. Traffic studies and new bus drop off procedures for a few schools were to be conducted /piloted in the Spring of 2020, but NPS shut down in March 2020 due to COVID, halting the work. When the school year started in September 2020, NPS operated the new routes under a mixture of learning styles (hybrid, remote and in person). A true test was not possible at that time.

- True usage of the bell system was not possible until the 2021-22 school year. In September 2021, with a full complement of students, a shortage of bus drivers and an additional 2,300 Norwalk residents from the previous year, NPS began the transportation operation under the prescribed bell schedule for the 2019-20 school year. Along with a shortage of bus drivers, increased traffic congestion and city-wide construction, the disastrous mix resulted in late morning arrivals up to an hour. These late arrivals created a need for change.

**FINDING**

The late arrivals of school buses under the 2020-21 bell schedule caused the Board of Education (BOE) to revert back to the 2019-20 bell times. Within a two-week period, the NPS experienced a 95-97 percent on time performance with 90 percent ridership, in comparison to a 50 percent on time performance and 68 percent ridership previously. This gave the District the flexibility to consolidate routes, remedy the driver shortage and create a savings. A portion of this savings assisted in increasing drivers' weekly bonus as a retention incentive.

The three to five percent lateness at the schools were explained in the following manner:

- First Tier (high school), two to three out of 40-42 buses arrived on average three to five minutes later than scheduled time.

- Second Tier (middle and early elementary), five out of 59 buses arrived on average 8-10 minutes later than scheduled time.
• Third Tier (middle elementary and late elementary), six out of 56 buses arrived on average 8-10 minutes later than scheduled time. There was no traffic study and the additional cars on the road during the Tier 3 schedule is what caused NPS to return to their old, staggered bell times.

• There are many variables to later arrival in the afternoon such as issues with previous routes, traffic at the building, buses needing to return to a school (i.e., parent not at stop to receive students, behavioral issues).

• The construction of new schools and moves from site to site have a ripple effect on the contractor's ability to meet the schedules.

There was follow-up after this change in bell times to track and identify patterns at specific buildings and speak to the school administrators regarding any issues they may have experienced. The on-time performance was measured at 97 percent.

Costs remain lower than they would be if the bell times were not staggered, but the additional savings thought to be possible under the new schedule were not realized because there had not been sufficient traffic analysis performed. The traffic analysis that needs to be conducted will also need to incorporate the opening a new K-5 Science, Technology, Engineering, Arts and Mathematics (STEAM) Magnet Program that will integrate into a middle school model in 2022-23 at the Ponus campus. In addition, NPS is exploring school choice for middle school to support the current high school pathway programs located at the two academic high schools.

RECOMMENDATION

Recommendation 4-12:

Ensure that traffic patterns and congested roadways are considered, when planning transportation services for existing and new campuses and set adjusted bell times accordingly.

Involve a representative group of principals and the transportation bus provider vendor in establishing the routes and bell times. This should help NPS avoid issues during the implementation process.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

NPS works collaboratively with the City of Norwalk and regional school district peers in an effort to improve transportation services for NPS students.
The NPS Transportation Logistics Administrator is part of an informal network of 10 district transportation directors that offer support and resources for each other and help with ride sharing, when appropriate. They meet periodically to discuss mutual issues of concern.

The City of Norwalk Transportation and Mobility Manager is responsible for working with City traffic patterns and provides weekly updates to the NPS Transportation Logistics Administrator concerning road closures and major state construction projects. This helps the District to work with their vendor to plan temporary or permanent route changes that avoid any of these disruptions. The connection is informal and works well to keep school bus operations on schedule.

**COMMENDATION**

NPS is collaborating with other school districts and the City of Norwalk in an effort to address the needs of its students regarding congestion or other transportation matters to move students in and out of those districts as well as any movement within NPS.

4.2.3 *Bus Safety*

The NPS website contains information vital to parents, but the information does not fully address some of the key safety elements that students and parent need to consider.

**FINDING**

As shown in Exhibit 4-15, the Transportation website gives parents access to current bus routes, school assignments and transportation forms and requests. The bus routes are listed by bus number and include the time for pickup and the time for drop off at the school for that route.

**Exhibit 4-15**

NPS Transportation Website
The list below is a short but focused listing of the Do’s and Don’ts of Pupil Transportation & Safety Rules related to the behavior of students on a school bus that were provided to the Evergreen Review Team by the Transportation Department. Currently, the only rules are located on the Board of Education website under Policies, Bus Conduct Regulation Code 5131.01-R (last revised in June 1995). They are not published for the public to view, nor is there any indication how they are used to reinforce the Board of Education policies on student bus conduct.

They include:

- Pupils shall arrive at the bus stop before the bus is scheduled to arrive.
- Pupils must wait in a location clear of traffic and away from the bus stops.
- Behavior at the school bus stop must not threaten life, limb or property on any individual.
- Pupils must go directly to an available or assigned seat so the bus may safely resume motion.
- Pupils must remain seated keeping aisles and exits clear.
- Pupils must observe classroom conduct and obey the driver promptly and respectfully. Talking is not permitted at railroad crossings.
- Pupils must not use profane language.
- Pupils must refrain from eating and drinking on the bus except as required for medical reasons.
- Pupils must not use tobacco on the bus.

• Pupils must not have alcohol or drugs in their possession on the bus except for prescription medication required for a student.

• Pupils must not throw or pass objects on, from or into the bus.

• Pupils may carry on the bus only objects that can be held in their laps.

• Pupils must leave or board the bus at locations to which they have been assigned unless they have parental and administrative authorization to do otherwise. Parents will need to call the Transportation Office at 419-660-1822 for approval of any Transportation change.

• Pupils must not put head or arms out of the bus windows.

• Pupils who violate any of the Norwalk City School District Pupil Transportation and Safety Rules will receive the following correspondence and discipline actions; 1st Offense-Verbal Warning, 2nd Offense-Written Warning, 3rd Offense-2-day suspension from School Transportation, 4th Offense-5-day suspension from School Transportation, 5th Offense-possible 180-day suspension from School Transportation.

Exhibit 4-16 shows a brochure used in driver training in Ohio, published by the School Bus Safety Company for use in Ohio school districts. The brochure addresses bus safety at another level and can be used for safety awareness by children and parents.

Exhibit 4-16
School Bus Safety Company-School Bus Safety Brochure
RECOMMENDATION

Recommendation 4-13:

Add material to the NPS website on school bus rules and regulations as well as school bus safety.

Having published rules will ensure that parents and students are aware of the expectation for conduct and will provide a reference for training when rules are not followed.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

The previous ‘bus pass’ system was a paper pass used by secondary buildings only (for ridership/capacity purposes). The paper passes were often lost or misplaced by students. As a result, there were instances where students got on the wrong bus, and parents and NPS would have to track them down by asking who saw the child last.

An electronic system was identified that eliminated the problem of losing paper passes and allowed a student to be tracked regardless of the bus chosen to ride. The new system, called ZPass, is a passenger management system, rolled out across the District for K-12 eligible riders. ZPass consists of an RFID reader (small electronic sending unit) affixed to the side dash of the bus, located at the top of the staircase. Students swipe their ‘bus pass’ electronic card...
(looks similar to a school ID). The system was installed in Spring 2021 (funded through a COVID-19 grant). It was originally installed for exposure tracing purposes but has assisted with ridership counts. As this is a newer system, NPS is still working through internal kinks (bus pass printing/distribution). However, the system has proven to be very effective.

Another problem NPS found was that Kindergarten students were getting left behind. Bus drivers are not allowed to drop off a Kindergarten student if an adult is not there to pick them up. To help with this situation, the vendor for the RFID cards, CSI, created a neon orange card with a large letter “K” to identify kindergartners.

**COMMENDATION**

NPS has implemented a tracking system to monitor student riders and identify students that require an adult to be present for pick up.

**FINDING**

Student behavior on buses has been a subject of serious note during this project. Although cameras are in use on all buses and there are police officers at the schools when students are arriving and departing buses, behavior on the buses in transit remains an issue. During the initial outbreak of COVID, NPS used federal funds to place bus monitors on the buses. When the money ran out, the use of monitors was discontinued.

According to *School Transportation News*, each K-12 student spends an average of 40 minutes per day on the school bus—enabling Wi-Fi on the buses would allow students to use their phones or other devices to connect with their peers, complete online assignments, and check in with their teachers. According to the author of this newsletter, keeping students focused and on-task leads to fewer disciplinary incidents, calmer commutes, and more satisfied drivers. The Beekmantown Central School District in New York reported positive changes in student attendance, student discipline, and student achievement within a year of implementing Wi-Fi on buses.

On May 11, 2021, the Federal Communication Commission (FCC) released updated information on the Emergency Connectivity Fund (ECF) Program. There will be $7.17 billion made available to support school districts and libraries in their efforts to connect students without reliable Internet access at home. The initial application window will open soon and remain open for 45 days. This application window for ECF will cover purchases made between July 1, 2021, and June 30, 2022.

**RECOMMENDATION**

**Recommendation 4-14:**

Install Wi-Fi on three to five buses and provide student internet assignments over a grading period to determine if there is a positive behavioral change.

Monitoring the effectiveness of the pilot program will allow NPS to determine if Wi-Fi should be expanded or provided on all buses in the future.
FISCAL IMPACT

According to Cradlepoint, which provides wireless edge solutions for K-12 school districts, the cost for installing Wi-Fi on each bus ranges between $500-$3,000, depending on the router and Net Cloud options chosen. The wide range of cost is based largely on the network choice of LTE or 5G technology (5G is the technology that came after 4G LTE to increase the speed of transmission). Assuming a cost of $3,000 per bus for five buses, the initial cost would be $15,000. The operations costs are about 10 percent of the purchase price or estimated at $1,500/year. Costing is based upon the upper price point range. The Emergency Connectivity Fund (ECF) Program may help to defray these expenses to NPS and allow Wi-Fi to be installed on a greater number of buses.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Install Wi-Fi on Five Buses</td>
<td>($15,000)</td>
<td>($1,500)</td>
<td>($1,500)</td>
<td>($1,500)</td>
<td>($1,500)</td>
</tr>
</tbody>
</table>

FINDING

Although past attempts by NPS to use school bus stop-arm cameras failed due to a backlog of cases in the courts, the need for better enforcement of violators is needed.

The City of Norwalk and the Board of Education entered into a contract with Student Guardian/Redflex in 2013 to provide stop-arm cameras, which consisted of cameras mounted on the bus stop flag that is activated when the bus stops. It was designed to capture images of non-compliant vehicles doing unsafe maneuvers around the bus. After an initial evaluation of several routes where the highest number of offenses were experienced, cameras were placed on five bus routes from 2013 to 2015.

The service was based on an assumption of the number of infractions that the vendor would be able to process through the judicial system, but the courts became backlogged with cases. When the revenues did not materialize, the cameras were removed from service.

In 2018, the National Association of State Directors of Pupil Transportation Services (NASDPTS) conducted a National Stop Arm Violation survey of 108,944 school bus drivers. The survey reported 83,944 vehicles illegally passing their buses on one single day alone. The study surmises a 180-day school year would result in over 15 million violations. There were 38 states and the District of Columbia responding to the survey.

In 2019, the NASDPTS conducted another survey with 39 states participating and found 17 million school bus stop-arm violations representing a two million violation increase from 2018. There were 131,345 school bus drivers participating and observing 95,500 violations per day, or an increase of 12,000 violations per day over 2018.

Connecticut state law allows municipalities or local or regional boards of education to install “live digital video school bus violation detection monitoring systems,” or contract with a private vendor to do so. A “live digital video school bus violation detection monitoring system” is a
system with one or more cameras and computers that produce live and recorded images of vehicles that fail to stop for a school bus as the law requires (CGS § 14-279a).

The law sets the following conditions for using such a system:

- the system must produce (a) a live visual image, viewable remotely, and (b) a recorded image of the violating vehicle’s license plate that indicates the violation’s date, time, and location;
- it must be installed in such a way that only a vehicle’s license plate number is recorded;
- it must not record images of vehicle occupants or other people or vehicles in the vicinity at the time of recording; and
- all school buses with an operational monitoring system must display a warning sign to that effect.

According to a 2019 NASDPTS survey, 131,345 school bus drivers observed 95,500 vehicles illegally passing, which equates to approximately 1.38 violations per day per driver. Stop arm video is receiving attention throughout the country and the success of the program may depend upon a simplistic approach, like administrative adjudication instead of criminal adjudication in the courts.

Connecticut allows administrative adjudication and has established a Centralized Infractions Bureau (CIB) to handle a breach of a state law, regulation or local ordinance that is identified as an infraction by the Legislature. A person who is charged with an infraction is usually not required to go to court. Payment of the total amount due by mail, in person, or on-line is authorized by section 51-164n of the Connecticut General Statutes. There is no right to a trial by jury in any matters dealing with violations that are payable through CIB where the maximum penalty is a fine of $500 or less, such as stop arm law violations.

In March 2021, Newport News VA Public Schools (NNPS) and its local law enforcement provider launched a new school bus safety program that included the addition of stop-arm cameras and other technology to the district’s buses. As part of the program all 340 of NNPS buses are now equipped with cloud-connected stop-arm cameras, 4G LTE connectivity, and 360-degree view safety cameras at no cost to the district and will be funded by fines received from stop-arm violations. The same program was initiated by the Manassas City Public Schools and the Manassas City Police Department Virginia in 2016-17.

In Connecticut, if a municipality or school board contracts with a private vendor to install, operate, and maintain a monitoring system, the contract must compensate the vendor for equipment costs and monitoring expenses and reimburse it for system installation, operation, and maintenance costs. Municipalities or their school boards must use the money they receive from stop arm fines to pay the vendors for installing, operating, and maintaining the monitoring systems (CGS § 14-279a(b)).

The contract must also require the vendor to report annually to the town or school board on the number of tickets issued as a result of the monitoring system and the amount of money collected.
The town or school board must submit this information to the State Transportation Committee within 30 days (CGS § 14-279a(b)).

Violators of Connecticut’s stop arm law face a penalty of (1) a $450 fine for a first offense and (2) for a subsequent offense, a fine of $500 to $1,000, 30 days in prison, or both (CGS § 14-279(b)). The law requires the state to remit 80 percent of the fines collected from violators to the municipalities (Norwalk) in which the violations occur after crediting twelve per cent of such fine amounts to the Special Transportation Fund established under state law (Section 13b-68) and crediting eight percent of such fine amounts to the General Fund.

The violators pay for the program and the contractor manages the citation program and other elements of the program. There is no cost to the school district and services include:

- installation and deployment of safety technology;
- complete citation management;
- violator support and call center management;
- ongoing support for community stakeholders;
- collections and payment processing;
- contestation and adjudication services;
- project management for program deployment; and
- monthly reporting and data management.
RECOMMENDATION

Recommendation 4-15:

Explore the feasibility of installing stop-arm cameras on school buses to increase student safety and potentially generate revenues for the District.

Student safety is the primary reason for implementing a program of this kind. To make it feasible, however the selected vendor should have a history working in Connecticut, and the proven ability to implement a process that will ensure that violators are processed rapidly through the courts and fines are collected to offset the cost of the system in a timely manner.

FISCAL IMPACT

Assuming that each of the 63 NPS buses videos one violator per/day during a 180-day school year, 11,000 violators could potentially be ticketed. If a vendor were able to process even half of those violations, over $2 million in fines ($450 per first offense) would be assessed. The State would retain 20 percent, and the vendor would retain a percent of the revenues as reimbursement for equipment and the services rendered. While these numbers are contingent on full implementation of the system on all buses, and the collection of all assessed fines, new revenues of several hundred thousand dollars annually may be possible in future years after the cost of the equipment has been covered.

4.3 HEALTH SERVICES

The NPS Health Services Department is responsible for addressing the health and wellness needs of all students. As described in the Connecticut Health Care Associates Contract, the objective of the School Health Program is to assist each child to obtain his/her greatest degree of physical, social, mental, and emotional health. NPS works to achieve this through a comprehensive health program that is intended to minimize or remove health-related barriers to learning.

4.3.1 Organization and Staffing

The Health Services Department is managed by a Health Services Coordinator. The Coordinator is a Registered Nurse with 30 years of experience with NPS—seven of which is in the current role. This position is responsible for creating and reviewing health-related policies and procedures, quality assurance, training, auditing, staffing, and responding to emerging issues. This position reports to the Assistant Superintendent of Business and Operations.

Recently, the NPS created an Assistant School Nurse Supervisor and a Float Nurse/COVID Coordinator to assist with the workload associated with meeting the medical needs of approximately 11,500 students at 21 different campuses. The Assistant School Nurse Supervisor provides assistance to the Coordinator of School Health Services with planning and organizing a multiservice school health program. This position also coordinates activities with the Norwalk Health Department to address issues related to monitoring of disease incidence. The COVID
Coordinator/Float Nurse is responsible for COVID state and federal reporting, implementing symptom screening protocols, responding to COVID cases, contact tracing, and assisting with communication of quarantine guidance to students and families. This position also serves as a Float Nurse to cover school nurse vacancies as needed.

Each of the campuses has an assigned school nurse. Per the union contract, all school nurses must have a minimum of a B.A. or B.S. degree, and be registered by the Connecticut State Board of Examiners for Nurses. The school nurse is responsible for coordinating and managing the health needs of individual students during the school day as well as promoting health and safety for all students at a given site. Nurses provide training to school-based staff to serve as delegates in responding to emergency situations and to administer medication. Delegation of some medical services to qualified school personnel is voluntary; however, some critical medical need students and treatments are not permitted to be delegated. School nurses also work closely with school administration on students who have an IEP or 504 Plan to ensure students are receiving appropriate medical care. NPS also provides nurses that are bilingual to accommodate the needs of the school district population.

In addition to nursing staff who are managed under the Health Services Office, there are health aides assigned to three campuses to provide support to the school nurse and staff the clinic. These positions are supervised directly by the Principal and work in close coordination with the School Nurse. Special Education also contracts with Licensed Practical Nurses to provide necessary care to medically fragile students onsite and during transportation.

The organizational structure of the Department is provided in Exhibit 4-17.

Exhibit 4-17
Health Services Organizational Structure

[Diagram of organizational structure]

Source: Compiled by Evergreen, January 2022.
Exhibit 4-18 provides a summary of the number of number of facilities/programs, enrollment, and nurses for Norwalk and for peer school districts in Connecticut.

### Exhibit 4-18
**Number of Facilities Compared to Total Numbers of School Nurses**

<table>
<thead>
<tr>
<th>Connecticut Peer School District</th>
<th>Number of Schools/Programs*</th>
<th>Total Enrollment*</th>
<th>Total Number of School Nurses (incl. Coordinator Position) *</th>
<th>Ratio of School Nurse to Total Enrollment</th>
<th>Ratio of School Nurse to Schools/Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk Public Schools</td>
<td>24</td>
<td>11,716</td>
<td>25.8</td>
<td>1 N : 454 S</td>
<td>1.1 N : 1 S/P</td>
</tr>
<tr>
<td>Danbury Public Schools</td>
<td>20</td>
<td>11,928</td>
<td>26.6</td>
<td>1 N : 448 S</td>
<td>1.3 N : 1 S/P</td>
</tr>
<tr>
<td>Fairfield Public Schools</td>
<td>20</td>
<td>9,671</td>
<td>22.6</td>
<td>1 N : 428 S</td>
<td>1.1 N : 1 S/P</td>
</tr>
<tr>
<td>Greenwich Public Schools</td>
<td>17</td>
<td>9,048</td>
<td>18.0</td>
<td>1 N : 503 S</td>
<td>1.1 N : 1 S/P</td>
</tr>
<tr>
<td>Westport Public Schools</td>
<td>10</td>
<td>5,344</td>
<td>13.0</td>
<td>1 N : 411 S</td>
<td>1.3 N : 1 S/P</td>
</tr>
</tbody>
</table>


*Includes nurses who are provided to participating private schools in the district.

Exhibit 4-19 provides an overview of NPS students with reported disabilities and provides a comparison to the overall state rate for the 2019-20 school year.

### Exhibit 4-19
**NPS Students with Disabilities by Primary Disability**

<table>
<thead>
<tr>
<th>Primary Disability</th>
<th>District</th>
<th>State</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Count</td>
<td>Rate (%)</td>
</tr>
<tr>
<td>Autism</td>
<td>180</td>
<td>1.5</td>
</tr>
<tr>
<td>Emotional Disturbance</td>
<td>103</td>
<td>0.9</td>
</tr>
<tr>
<td>Intellectual Disability</td>
<td>44</td>
<td>0.4</td>
</tr>
<tr>
<td>Learning Disability</td>
<td>714</td>
<td>5.9</td>
</tr>
<tr>
<td>Other Health Impairment</td>
<td>257</td>
<td>2.1</td>
</tr>
<tr>
<td>Other Disability</td>
<td>109</td>
<td>0.9</td>
</tr>
<tr>
<td>Speech/Language Impairment</td>
<td>279</td>
<td>2.3</td>
</tr>
<tr>
<td><strong>All Disabilities</strong></td>
<td><strong>1,686</strong></td>
<td><strong>14.0</strong></td>
</tr>
</tbody>
</table>


The National Association of School Nurses recommends a needs-based formula approach for determining the appropriate level of staffing of full-time School Nurse to student ratio.

- 1:750 of well students;
- 1:225 in the student populations that may require daily professional school nursing services or interventions such as special education inclusions;
- 1:125 in student populations with complex health care needs; and
- 1:1 may be necessary with individual students with multiple disabilities.
The National Association of School Nurses also recommends that school districts provide a full-time RN in every school with additional staff to accommodate other student health needs, special education evaluations, students with an IEP and 504 Plan, and schools with large populations or large numbers of students with mental or social concerns.

**FINDING**

Total student enrollment of both well students and students with medical conditions necessitate an RN at each facility. The results of the staffing comparison signify that NPS is comparable to neighboring school districts in Connecticut and within staffing levels recommended by the National Association of School Nurses.

NPS has 478 students with critical care needs districtwide; IEP and 504 Plan students are in each facility. For students who have qualified for special education, the requirements of the Individual with Disabilities Education Act (IDEA) and the Individualized Education Program (IEP), health and education services must be delivered in the least restrictive environment. For students who do not require special education, Section 504 of the Rehabilitation Act of 1973 requires students with a disability to have full access to all activities, services, or benefits provided by public schools. Any school receiving federal funds must accommodate the special health care needs of its students with disabilities in order to provide them with a free and appropriate public education. NPS is in compliance with both NASN recommendations and IDEA requirements by ensuring that an RN is available at each school.

**COMMENDATION**

Norwalk Public Schools provides RNs at each location to meet the needs of all its students.

**FINDING**

The Health Services Coordinator’s length of tenure in the role has enabled her to build a network of substitute Registered Nurses who are trained on NPS policies and procedures. Substitute nurses are hired NPS staff members and are utilized on an as-needed basis. They are paid at the same union rate of $45.24/hour, but typically do not receive benefits due to limited hours worked over an annual period. There are currently five nurses that are available to cover temporary vacancies or absences on a weekly basis and three nurses that are able to provide support 1-2 days a month.

The ability to retain substitute Registered Nurses who are able to fill-in during absences has resulted in a savings to NPS. If Registered Nurses had to be requested from a placement service, the hourly rate would increase to $55-$65/hr.

**Exhibit 4-20** provides a summary of expenses for substitute nurses during 2020-21 and comparison of costs for contracted services.
Exhibit 4-20
Comparison of Expenses Related to Substitute Nursing Costs and Comparisons to 2020-21

<table>
<thead>
<tr>
<th></th>
<th>Hours</th>
<th>Rate</th>
<th>Total Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk Substitute School Nurses</td>
<td>4,986.13</td>
<td>$45.24</td>
<td>$225,803</td>
</tr>
<tr>
<td>Contracted Service Registered Nurses</td>
<td>4,986.13</td>
<td>$65.00</td>
<td>$324,098</td>
</tr>
<tr>
<td>Cost Difference</td>
<td></td>
<td></td>
<td>$98,295</td>
</tr>
</tbody>
</table>

Source: City of Norwalk Employee Detail Check History Report, 2022.

The resulting cost savings—plus the additional staff time that would be required to train substitute nurses unfamiliar with the schools, processes, specific student needs, and computer systems—is an effective and efficient process for meeting the medical needs of the District.

COMMENDATION

NPS has realized a cost savings by meeting short-term staffing needs for nurses by employing substitutes rather than utilizing a contracted service.

FINDING

The organizational structure of the Health Services Department is flat, with all staff members reporting to the Coordinator. This results in the manager of the Department being responsible for oversight and for management, training, placement, and review of 24 direct reports. In addition, the Coordinator also supervises and assigns floaters and substitutes. In most organizations, an effective span of control is defined as between six and ten direct reports.

NPS recently reclassified two positions to provide assistance with Department oversight, placement and daily staffing needs, COVID contact tracing, and meeting attendance. These positions are classified as the Assistant School Nurse Supervisor and the Float Nurse/COVID Coordinator.

The Float Nurse/COVID Coordinator is an RN who has the primary responsibility of completing all state and federal reporting and serving as a float nurse to cover school nurse absences as needed.

The job description for the Assistant School Nurse Supervisor includes the following:

- In the absence of the Coordinator, the Assistant Supervisor assumes supervisory responsibility for ALL school health programs; provides direction and assistance to schools without a nurse on the premises and may float when needed. Observes and provides assistance to school nurses when needed.

- Serves on interdisciplinary teams to assist with planning educational programs for students with special needs; speaks to parents, civic, cultural and other public groups regarding school health programs, services and related topics.
- Assists staff with clinical problem solving using the nursing process, standard of care, and obtains needed resources; advises on medical issues and seeks school medical advisor related to 504 plans/IEP’s when needed.

- Oversees collection of health data for monitoring of programs and meets state and federal mandating reporting guidelines.

- Conducts orientation of staff related to program policies and procedures, delegating specific areas for this process to senior staff when appropriate; assists coordinator in providing on-going in-service evaluation for staff.

- Responsible for centralized record keeping and other administrative responsibilities as deemed necessary by the Coordinator and/or Assistant Superintendent of Business and Operations.

The job description requires this position to serve in a position of leadership, but does not require any direct supervision of staff.

**RECOMMENDATION**

**Recommendation 4-16:**

**Realign staff members, roles and responsibilities within the Health Services Department to reduce some administrative burden from the Coordinator.**

The NPS should realign supervisory responsibilities to better distribute the supervisory workload within the Department. There should also be a review of roles and responsibilities of the three district-level positions (the Coordinator, the Assistant School Nurse Supervisor, and Float Nurse/COVID Coordinator) to identify functional efficiencies and provide both staff members with professional development opportunities. Placing the supervision and assignment of float nurses and substitutes under one of these positions, and annually assessing the float and substitute needs to insure the needs are being met, would allow the Coordinator the focus on the administration of the Department.

The current Coordinator has 46 years of work experience—30 of those with NPS. Given the length of tenure and approaching retirement, there should be a succession plan in place to allow for transition in management without any perceived loss of student care.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

---

**4.3.2 Operating Policies and Procedures**

The Health Services Office has developed policies and procedures that are consistent with the State of Connecticut’s Clinical Guidelines for School Nurses. The Guidelines cover all topics related to annual training, delivery of medical services, development of specific student care
plans, COVID reporting procedures, tracking and management of health data, and instruction on health services.

**FINDING**

The Health Services Department is responsible for the management of all health-related student records. In addition to storage of all medical and immunization records, staff record all reported injuries, student visits, medication administrations, treatments, and the number of contacts with parents, doctors, and teachers where exchange of data occurred.

The 2020 and 2021 Health Services Reports are not reflective of a “typical” year given the disruption of the school year and remote learning.

The 2018-19 school year is more representative of the in-person interactions; compiled data from all NPS public schools is shown in **Exhibit 4-21**.

**Exhibit 4-21**

2018-19 Health Services Summary

<table>
<thead>
<tr>
<th>Category</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Injury Occurrence</td>
<td>22,425</td>
</tr>
<tr>
<td>Health Visits</td>
<td>52,172</td>
</tr>
<tr>
<td>Number of Scheduled Students</td>
<td>8,227</td>
</tr>
<tr>
<td>Medication Administered</td>
<td>13,011</td>
</tr>
<tr>
<td>Non-visits/Data Exchange</td>
<td>32,827</td>
</tr>
<tr>
<td>Number of Screenings</td>
<td>20,846</td>
</tr>
<tr>
<td>Total Number of Students Seen</td>
<td>9,656</td>
</tr>
<tr>
<td>Total Visits</td>
<td>80,770</td>
</tr>
</tbody>
</table>

*Source: NPS Health Services SNAP Data Report, 2022.*

Staff collect all data related to student health care needs in the SNAP system. These data are used to track student needs, emerging issues, and provide documentation for state and federal reports. In 2018-19, there were a total of 11,501 students enrolled, and 9,656 students were seen by school nurses for injury occurrence and health visit—for a total of 80,770 visits.

School Nurses are also responsible for management of all students’ medical records. Requirements for maintaining confidential educational records are set by federal law. IDEA regulations require school districts to:

- protect the confidentiality of personally identifiable information at the collection, storage, disclosure, and destruction stages;
- designate one agency official as responsible for ensuring confidentiality of personally identifiable information;
- train everyone who collects personally identifiable information on the state’s policies and procedures for assuring confidentiality; and
- maintain for public inspection a current list of names and positions of the employees within the district who may have access to personally identifiable information. (34 CFR 300. 572)
The Health Services Department implements this law through the requirement that all paper medical records are stored in locked file cabinets within the clinic and access is limited to appropriate staff. The Health Services Coordinator is responsible for ensuring the security of records, proper records retention and destruction procedures, and training of staff on records management. The Coordinator also maintains a list of school nurses and officials that have access to student information.

COMMENDATION

NPS has a thorough and consistent data collection, reporting, and compliance system for records management.

FINDING

The Health Services Department developed COVID protocols for student testing, quarantine requirements, and contact tracing prior to schools reopening. In collaboration with a private health care provider, staff also developed a weekly school-based PCR testing program for all NPS students. This is a voluntary program that requires parental consent, and results are provided to parents within 24 hours via a HIPPA compliant online portal.

In addition, the Health Services Coordinator and staff collaborated with the City Health Department and other health providers to hold vaccine clinics for students and staff. These pop-up vaccine clinics have been held in multiple locations around the City and at schools to provide easy access for students and their families. The Health Department posts a weekly schedule showing where the clinics will be held and the times they will be open. Health Services staff are responsible for ensuring students have parental permission prior to receiving the vaccine, for record keeping, and reporting of all data. The NPS website is routinely updated with changes to COVID protocols, vaccine clinic locations, and screening information.

COMMENDATION

NPS has developed procedures and protocols to address health and safety needs related to the COVID pandemic and collaborated with the City Health Department and 3rd party providers to meet the medical needs of NPS students.
CHAPTER 5:
HUMAN RESOURCES
Chapter 5 reviews the human resources functions of Norwalk Public Schools and is divided into the following six broad topics:

5.1 Organization and Management
5.2 Personnel Policies and Procedures
5.3 Pension and Benefits
5.4 Recruitment, Hiring, and Retention
5.5 Labor Relations
5.6 Performance Evaluation

Personnel management is a critical function in school districts. The staff in a Local Education Agency’s (LEA’s) human resources department must ensure that complex personnel policies are followed. In many cases, this department provides the first impression of the LEA’s quality to potential employees.

5.1 ORGANIZATION AND MANAGEMENT

The NPS Human Resources Department (HR) is overseen by the Director of Human Resources who reports directly to the Superintendent of Schools. The Department has undergone a significant reorganization over the last year resulting in a reconfiguration of positions and an overall reduction in staff. As shown in Exhibit 5-1, there are a total of 11 full-time regular HR positions that report to the Director; five of those positions are vacant.

Exhibit 5-1
Human Resources Department
Organization Structure

Source: Created by Evergreen through interviews, February 2022
In addition to the 11 positions, the organization chart shows a temporary position charged with managing the COVID related responsibilities specifically for staff. This position is grant funded and works closely with the Health Services Department that manages the COVID response relating to students. At the point when this temporary position is no longer needed, it will be eliminated.

There are also two part-time positions that appear in the Human Resources budget and are part of the Teacher Education and Mentoring (TEAM) Program. TEAM is a professional growth model that incorporates the Connecticut Standards for Professional Learning and provides beginning teachers with multiple opportunities to reflect on their practice, analyze student data and outcomes, and identify areas for growth and improvement for their individual professional learning.

When these individuals are working in the central office, they are physically housed in the Instructional area, and work directly with the leadership in that area. While these positions provide support for teachers, they are not technically serving in a Human Resource function and are not included in the staff count for the HR Department for purposes of this study.

In February 2022, the Department had five vacancies, shown as shaded in blue in the chart.

In December 2021, each of the HR Generalist and Confidential HR Associates was assigned to support a group of schools, with each position carrying approximately the same workload. With the two Confidential HR Associate vacancies, the workload for the remaining two Generalists has doubled.

The newly hired Labor Relations/Legal Counsel position also holds the title of District Title IX Coordinator for NPS. This position is responsible for gender and sex-based discrimination, sexual harassment, sexual assault, gender parity, gender identity issues, and gender program equity, such as in athletics.

**Exhibit 5-2** provides a summary of the number of employees on the payroll as of December 2021. This snapshot includes filled positions, including a staffing count in terms of the number of employees, and the staff full-time equivalent (FTE) counts broken down by location. In the FTE count, staff members working part-time in the school are counted as a fraction of full-time. For example, a teacher who works half-time in a school contributes 0.50 to the school’s staff count.

**Exhibit 5-2**

**Employee and FTE Counts by Location**

**As of December 22, 2021**

<table>
<thead>
<tr>
<th>Location</th>
<th>Full-time Count</th>
<th>Full-time FTE</th>
<th>Part-time Count</th>
<th>Part-time FTE</th>
<th>Total Count</th>
<th>Total FTE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Campus-Based</td>
<td>1,443</td>
<td>1,429.5</td>
<td>308</td>
<td>246.8</td>
<td>1,751</td>
<td>1,676.3</td>
</tr>
<tr>
<td>Percent of Total Staff</td>
<td>88.7%</td>
<td>88.6%</td>
<td>74.9%</td>
<td>72.0%</td>
<td>85.9%</td>
<td>85.7%</td>
</tr>
<tr>
<td>Department/Program Total</td>
<td>184</td>
<td>183.2</td>
<td>103</td>
<td>96.2</td>
<td>287</td>
<td>279.4</td>
</tr>
<tr>
<td>Percent Of Total Staff</td>
<td>11.3%</td>
<td>11.4%</td>
<td>25.1%</td>
<td>28.0%</td>
<td>14.1%</td>
<td>14.3%</td>
</tr>
<tr>
<td>Grand Total</td>
<td>1,627</td>
<td>1,612.7</td>
<td>411</td>
<td>343.0</td>
<td>2038</td>
<td>1,955.7</td>
</tr>
</tbody>
</table>

*Source: NHS Human Resources Department, January 2022.*
As shown in **Exhibit 5-2**, the 2,038 employees equate to a total of 1,955.7 FTEs.

Campus-based staff account for 88.7 percent of the District’s full-time staff, and 85.7 percent of total staff.

**Exhibit 5-3** compares the 2019-20 pupil to employee ratios to a select group of peer school organizations.

### Exhibit 5-3
**Pupil to Employee Ratios**
**2019-2020**

<table>
<thead>
<tr>
<th>School District</th>
<th>Total Students</th>
<th>Total Staff</th>
<th>FTE Teachers</th>
<th>Pupil/Teacher Ratio</th>
<th>Pupil/Staff Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Norwalk</td>
<td>11,642</td>
<td>1,878</td>
<td>883</td>
<td>13</td>
<td>6.2</td>
</tr>
<tr>
<td>Stamford</td>
<td>16,479</td>
<td>2,505.6</td>
<td>1,317.6</td>
<td>12.51</td>
<td>6.6</td>
</tr>
<tr>
<td>Greenwich</td>
<td>9,015</td>
<td>1,477.0</td>
<td>747.5</td>
<td>12.06</td>
<td>6.1</td>
</tr>
<tr>
<td>Fairfield</td>
<td>9,624</td>
<td>1,712.3</td>
<td>848.1</td>
<td>11.35</td>
<td>5.6</td>
</tr>
<tr>
<td>Westport</td>
<td>5,312</td>
<td>919.8</td>
<td>473.2</td>
<td>11.23</td>
<td>5.8</td>
</tr>
<tr>
<td>Danbury</td>
<td>11,903</td>
<td>1,723.8</td>
<td>827.3</td>
<td>14.39</td>
<td>6.9</td>
</tr>
<tr>
<td>White Plains, NY</td>
<td>7,155</td>
<td>1,146.1</td>
<td>619.1</td>
<td>11.56</td>
<td>6.2</td>
</tr>
<tr>
<td>New Rochelle, NY</td>
<td>10,553</td>
<td>1,437.1</td>
<td>700.1</td>
<td>15.07</td>
<td>7.3</td>
</tr>
<tr>
<td><strong>Average</strong></td>
<td><strong>10,210</strong></td>
<td><strong>1,600</strong></td>
<td><strong>802</strong></td>
<td><strong>13</strong></td>
<td><strong>6.3</strong></td>
</tr>
</tbody>
</table>

*Source: National Center for Education Statistics, 2021.*

As shown in **Exhibit 5-4**, there are a number of systems that support the overall human resources operation.
Exhibit 5-4
Human Resource Systems Overview

<table>
<thead>
<tr>
<th>System</th>
<th>MUNIS</th>
<th>NovaTime</th>
<th>Frontline AppliTrack</th>
<th>Frontline Absence Management (AESOP)</th>
<th>Frontline Evaluations</th>
<th>Frontline Performance Learning Management (PLM)</th>
<th>Frontline Central</th>
</tr>
</thead>
<tbody>
<tr>
<td>Owner</td>
<td>City of Norwalk (Finance)</td>
<td>District Finance (Payroll)</td>
<td>Human Resources</td>
<td>Human Resources</td>
<td>Human Resources</td>
<td>Human Resources</td>
<td>Human Resources</td>
</tr>
<tr>
<td>Description</td>
<td>City and District's primary HRIS System</td>
<td>Records employee time &amp; absences for payroll purposes</td>
<td>Talent acquisition system with end-to-end workflow for posting, hiring and onboarding applicants</td>
<td>Records staff absences and locates substitutes for certified staff absences.</td>
<td>System for Certified staff Performance Evaluations</td>
<td>Registers employees in District performance learning events.</td>
<td>Central point for employee records</td>
</tr>
<tr>
<td>Reporting Examples</td>
<td>Metrics across wide range of employee demographics</td>
<td>Regular payroll, O/T usage, badge usage</td>
<td>Open positions, Time to Fill, and Other metrics</td>
<td>Leave reporting (COVID/FMLA/Other), general district attendance patterns</td>
<td>Performance ratings</td>
<td>Staff development trends, training hours, training compliance requirements</td>
<td></td>
</tr>
<tr>
<td>Opportunities</td>
<td>Continue to partner with District Finance to leverage system data</td>
<td>Enhance application experience</td>
<td></td>
<td>District-wide launch of Non-Certified Staff evaluations scheduled for SY2020-2021</td>
<td>District-wide launch scheduled for SY2020-2021</td>
<td>District-wide launch scheduled for SY2020-2021</td>
<td></td>
</tr>
<tr>
<td>Challenges</td>
<td>No control over data input</td>
<td>Complex reporting</td>
<td>Not intuitive system from hiring administration nor applicants' perspective</td>
<td>AESOP doesn't interface with NovaTime - requires manual input</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: NPS Human Resources Department, October 2021.

**FINDING**

The Human Resources Department has undertaken a restructuring process and is currently staffed at a level below industry standards. With 12 positions (five of which are currently vacant), including the Director, and an average of 1,900 FTE employees, the staff to HR employee ratio in the Norwalk Public Schools is 158 staff to every one FTE employee, or .63 Human Resources employees for every 100 employees. In addition, the Department is responsible for oversight of retiree benefits and assisting the City in the administration of retiree pension payments.

According to the 2018 HR Benchmarks Report published by Bloomberg Law in June 2018, “HR departments have a median of 1.5 employees for every 100 in the workforce, which represents an all-time high in the survey’s 40-year history.” For decades, the ratio seemed to be in a holding pattern at 1.0 to 100.

NPS has implemented a multi-pronged approach for handling the workload. First, the Department is making greater use of technology. For example, the Frontline AppliTrack system is being used for posting, hiring and onboarding applicants with very little paper being moved.
during the process. Secondly, this automation is also allowing principals and department heads to assume more control over the processes that at one time were handled manually by HR staff. The process begins when the principal or department head initiates a request for a position to be posted and through a series of on-line and electronic reviews and approvals, ends with HR making a job offer and providing on-line orientation and some mandatory training.

Since the study began, additional vacancies have occurred which have impacted the overall workload in the department, which despite the improvements has resulted in employee burnout. Even when all of the positions are filled, the Department remains understaffed.

RECOMMENDATION

Recommendation 5-1:

Hire an additional HR Generalist position to reduce the current workload.

Once the position is filled and fully functioning, the Department will need to conduct a staffing needs assessment to determine the appropriate level of staffing needed to provide the level of service required by NPS employees.

FISCAL IMPACT:

The HR Generalist position makes approximately $65,000 annually. Benefits are estimated at 30 ($19,500) percent for a total cost for implementing this recommendation of $84,500.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hire an HR Generalist</td>
<td>($84,500)</td>
<td>($84,500)</td>
<td>($84,500)</td>
<td>($84,500)</td>
<td>($84,500)</td>
</tr>
</tbody>
</table>

5.2 PERSONNEL POLICIES AND PROCEDURES

Personnel policies and procedures provide the employees in an organization basic information regarding the employer’s expectations, and general guidance on various topics. Many policies and procedures normally found in an employee handbook or policy manual are found in the bargaining agreements in a heavily unionized organization such as Norwalk Public Schools. Within those bargaining agreements, there are variances in the processes for filing a grievance, the amount and type of leave and the availability of benefits for the employee and their families.
There are, however, non-affiliated employees that need guidance and there are common laws, Board policies, practices and procedures that pertain to all employees (such as sexual harassment and equal opportunity laws).

Section 4000 of the School Board Policies contains a total of 58 personnel-related policies.

**FINDING**

NPS has created and launched a new employee handbook that consolidates policies and the manner in which those policies are to be implemented.

The New Hire Orientation packets provided at the time of the study contained copies of specific policies, such as Sexual Harassment, and an acknowledgement form shown in **Exhibit 5-5**.

### Exhibit 5-5
**New Employee Acknowledgement Form**

While the information shown in the acknowledgement form is important, should the hard copy documents be lost or should NPS make revisions to the documents listed above. Therefore, during the orientation staff members were instructed where on the website they could find the Board policies. The signed acknowledgement was created so NPS would have definitive proof that those specific polices were discussed and brought to the attention of staff.
In January 2022, Evergreen was provided a draft of the Employee Handbook that was in the final drafting stage and was finally approved and launched for all employees in February 2022. The Director and Labor Relations/Legal Counsel said they reviewed the document with the union representatives and then proceed to finalize the document. In its draft form, the Employee Handbook contains all of the information provided in the orientation packet however the policies are presented in a readable format and provides instruction on how the employee should proceed if a situation arises. For example, instead of restating the Board Policy regarding confidential information, the Handbook tell the employee how to the policy applies and how to implement it:

_Keep confidential documents inside our district’s premises. If a circumstance arises that requires removal, then you must speak with a supervisor first and provide the intended location and means of securing the documents._

Additionally, the draft document contains organization charts and other information that introduces the employee to the district and helps them understand how all the various department operate and the departments’ areas of responsibility.

**COMMENDATION**

NPS has developed a comprehensive Employee Handbook that contains policies and procedures to guide all employees.

**FINDING**

While efforts are underway to update policies, in general, a number of the Personnel Policies found in Section 4000 of the School Board Policies have not been updated since 1998.

During interviews with departmental staff, the Evergreen Team was told that some policy revisions are in progress to update the current language based on the current environment in education and federal laws today. For example, Policy 4152.05 - Family, Medical and Pregnancy-related Leave Policy (last revised in 1998) clearly has not taken into account the many revisions to the Federal 29 U.S. Code Subchapter I—General Requirements For Leave that have occurred since 1998. Removing the reference to pregnancy and replacing it with reference to leave for either spouse at the “birth of a son or daughter of the employee and in order to care for such son or daughter” would be an appropriate language change.

Given the importance of Personnel Policies, maintaining up to date Board policies is critical.

**RECOMMENDATION**

Recommendation 5-2:

Work with the School Board liaison to identify personnel policies needing revision, and refer the recommended changes to the School Board for review and approval.

As amended policies are adopted by the Board of Education, the New Employee Handbook should also be revised as changes are necessary.
FISCAL IMPACT

This recommendation can be implemented with existing resources.

5.3 **PENSION AND BENEFITS**

NPS employees are, for the most part provided similar benefits to those provided to all City employees. These include the following:

- **Medical and Related Insurance Coverages** - The City offers a Point of Service (POS) medical health plan for its employees provided through the Anthem Connecticut Partnership Plan, and the amount of employee contributions to the plan are set in the individual bargaining agreements. Under the same CT Partnership program Dental and Vision coverage is provided through CIGNA Healthcare and Pharmacy Coverage is provided through CVS/Caremark.

Employees are also provided employer-paid life insurance coverage according to the provisions found in the bargaining agreements.

The City, in partnership with MetLife, offers several voluntary benefit programs:

- **Supplemental Life and Accidental Death and Dismemberment (for Employees and Dependents)**
  - Municipal Employees can purchase term life insurance with accidental death and dismemberment in $10,000 increments to a maximum of the lesser of 5 times their pay or $500,000. Minimum benefit is $10,000 and the there are no medical questions asked for coverage $100,000 and below
  - Firefighters and Police Officers can purchase coverage in $10,000 increments to a maximum of the lesser of 5 times their pay or $500,000. Minimum benefit is $10,000 and the there are no medical questions asked for coverage $100,000 and below
  - Spouse coverage may be purchased in $5,000 increments to a maximum of $100,000, not to exceed 50% of the employee’s optional life benefit
  - Child coverage may be purchased in options of $1,000, $2,000, $4,000, $5,000 or $10,000 (not to exceed the spouse benefit amount). NOTE: children 15 days to 6 months old are only eligible for $1,000.

- **Voluntary Long-Term Disability** - This is offered at 60% of pre-disability earnings with a maximum monthly benefit of $6,000.

- **Whole Life Insurance** - Whole Life Insurance is a policy that is owned by the employee; it can never be cancelled, even if their health changes and the employee can purchase additional coverage to supplement other life insurance coverages.
- **Group Accident** - Employees have the option to purchase the high plan or the low plan, on a guaranteed issue basis (meaning no medical questions asked). This coverage is designed to provide (to the insured person) coverage for certain losses resulting from an accident only (does not provide reimbursement of medical expenses and does not replace medical insurance).

- **Retirement and Pension Benefits** - All NPS regular, full-time paid employees, other than teachers, who work more than 1,200 hours (1,100 hours for 10-month employees) per year are eligible to participate in the City of Norwalk Pension Plan, and retirees are provided benefits through that plan.

Teachers and other professional educators as defined under the Conn. Gen. Stat. § 10-153b(b). are part of the Connecticut Teacher Retirement Plan. The employee contribution to the pension is 7 percent of their salary plus they are required to contribute 1.25 percent of their salary for retiree healthcare benefits.

The Norwalk City Employees’ Pension Plan is governed by the City of Norwalk Pension Board which is made up of

(a) a public member, who shall be the Chairman of the Pension Board, appointed by the Mayor of the City;

(b) five (5) public members appointed by the Mayor of the City;

(c) the City’s Director of Finance or his/her designee; and

(d) five (5) Members (as defined in Section 1.17) designated by the Coalition of unions representing Members.

Prior to July 1, 2012, the City Pension Plan was considered a defined benefit plan, meaning that after a period of years, the employee was vested and would begin receiving a defined benefit amount based on a formula that takes into account the employee’s age at the time of retirement, length of service and highest three years of salary. For employees vested in the plan prior to July 2012, the defined benefit plan remains in effect.

Employees hired and vested after July 1, 2012, are now required to make mandatory pre-tax contributions to a 401a Retirement Account. A 401a plan is an employer-sponsored retirement plan offered by many government agencies, educational institutions and nonprofit organizations. The plan is considered a defined contribution plan, as the distribution at the time of retirement is based on the amount contributed and available in the fund. For non-certified employees that are automatically enrolled in the 401a plan with Empower, the employee’s contribution is 5 percent of their salary, and the District matches 5 percent. There is a two-year vesting period before the employee is eligible to withdraw the match.

**Exhibit 5-6** provides a summary of the benefits provided by employee group.
### Exhibit 5-6

**Benefits Provided by Employee Group**

<table>
<thead>
<tr>
<th>Bargaining Group</th>
<th>Health Coverage - % of Premium Paid by Employee</th>
<th>Pension Provider</th>
<th>Life Insurance Provided by NPS</th>
</tr>
</thead>
<tbody>
<tr>
<td>BOE - Exempt and Unaffiliated</td>
<td>19%</td>
<td>City of Norwalk</td>
<td>$150,000</td>
</tr>
<tr>
<td>United Public Service Employees Union</td>
<td>16%</td>
<td>City of Norwalk</td>
<td>$50,000</td>
</tr>
<tr>
<td>Executive Support Group</td>
<td>19%</td>
<td>City of Norwalk</td>
<td>$50,000</td>
</tr>
<tr>
<td>Food Services</td>
<td>18%</td>
<td>City of Norwalk Food Services Pension Plan</td>
<td>$50,000</td>
</tr>
<tr>
<td>Norwalk Association of School Administrators</td>
<td>19%</td>
<td>Connecticut Teacher Retirement Board</td>
<td>$350,000</td>
</tr>
<tr>
<td>Norwalk Federation of Educational Personnel (Non-exempt and Board-Certified Behavior Analyst (BCBA))</td>
<td>Non-exempt - 15%, BCBA - 18%</td>
<td>City of Norwalk</td>
<td>FT - $75,000; PT - $42,500; BCBA – 1 X Salary</td>
</tr>
<tr>
<td>Connecticut Health Care Associates</td>
<td>19%</td>
<td>City of Norwalk</td>
<td>$80,000</td>
</tr>
<tr>
<td>Norwalk Federation of Teachers</td>
<td>19%</td>
<td>Connecticut Teacher Retirement Board</td>
<td>$150,000</td>
</tr>
<tr>
<td>United Federation of Technicians</td>
<td>19%</td>
<td>City of Norwalk</td>
<td>$100,000</td>
</tr>
</tbody>
</table>

*Source: Compiled by Evergreen from interviews and Bargaining Agreements, December 2021.*

### FINDING

While much of the benefit information can be located on the NPS or City Website, there is no benefit page for NPS employees that provides an easily accessible site where they can go to get the information they may be seeking.

There is an employee intranet site that may contain some or all of this information, but one of the selling points for potential job applicant can be the type of benefits provided by the organization. As shown in the recruitment section of this report, almost all of posting sites, social media sites and other posters and publications point the potential applicant back to the NPS Job Opportunities page. The side menu provides links to the bargaining agreements that contain some of this information, but many school districts tout their benefit packages as one of the reason for joining their team.

For example, as shown in **Exhibit 5-7**, in the Hartford Public Schools, CT, the Careers page on the website contains the following.
Exhibit 5-7
Benefits Package in Hartford Public Schools

Become a Hartford Public School Teacher!
We have put together a comprehensive package of benefits and incentives, including:

- Competitive salary (hard-to-fill areas, i.e., math, have higher step placement on salary schedule)
- $3,000 #SigningIncentive for newly hired teachers in hard-to-fill positions (Bilingual, Blind, Deaf & Hard of Hearing, Math, Montessori, Sciences, School Psychologist, Spanish, Special Education, and TESOL)
- Career growth opportunities
- Opportunity to participate in school governance councils
- Loan forgiveness
- Tuition reimbursement
- Rich health care plan (including dental & vision)
- Life insurance
- Residency differential for teachers who reside in Hartford (3% of base salary)
- New teacher induction
- In-school teacher mentor

Source: https://www.hartfordschools.org/careers/careers/

As discussed throughout this report, NPS is providing many of these benefits and more, and is paying more than 80 percent of the employees premiums for health coverages and 100 percent of life insurance for every employee group.

In some instances, the schools will put together a general benefits guide and link the guide to the Careers page so that both new and current employees can have a quick reference guide with names, email addresses, phone numbers and links to insurance provider sites where additional information can be obtained. Some organizations provide not only the percent of premiums paid by the employee but provide real dollar information on the contributions made by the employer as a way of showing the employers’ commitment to its employees.

RECOMMENDATION

Recommendation 5-3:

Compile a benefit guide that not only shows the many benefits provided by NPS, but also provides contact information and links to where additional information can be found.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

5.4 RECRUITMENT, HIRING, AND RETENTION

Due to COVID and other related factors, NPS staff turnover rates—like many school districts nationally—are increasing. Teachers make up a large and very critical part of a school district’s workforce, which makes the tracking of trends all the more critical. According to a 2019 report from the National Center for Education Statistics (NCES), 8 percent of teachers leave the profession yearly and another 8 percent move to other schools, bringing the total annual turnover
rate to 16 percent. A RAND survey, fielded in early January 2021, found that nearly one-quarter of teachers indicated a desire to leave their jobs at the end of the school year, compared with the 16 percent pre-pandemic turnover rate cited by NCES.

**FINDING**

NPS is maintaining detailed records of staff turnover and particularly the turnover rates among teachers in an effort to plan for and stay ahead of the staffing needs of the schools.

As shown in **Exhibits 5-8 and 5-9**, the teacher turnover trends for the current year are far more severe than the actual turnover experiences in the 2020-21 school years.

### Exhibit 5-8

**Teacher Turnover and Hiring Trends**

**2020-21 Versus 2021-22 School Years To-Date**

<table>
<thead>
<tr>
<th>Teacher/NFT Exits SYTD (as of 10/11/2021)</th>
<th>Number</th>
<th>Annualized Turnover Percentage</th>
<th>Teacher/NFT Hires</th>
<th>Number</th>
<th>Percent To Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Teacher/NFT exits for SY2021-2022 to-date</td>
<td>56</td>
<td>20%</td>
<td>Hires since 6/1/2021 through 10/11/2021</td>
<td>180</td>
<td>16%</td>
</tr>
<tr>
<td>Teacher/NFT exits for SY2020-2021</td>
<td>93</td>
<td>9%</td>
<td>Hires from 6/1/2020 through 10/11/2020</td>
<td>112</td>
<td>10%</td>
</tr>
</tbody>
</table>

Source: NPS Human Resources Department, October 2021.

### Exhibit 5-9

**Teacher Turnover by School**

**2020-21 Versus 2021-22 To Date**

<table>
<thead>
<tr>
<th>School/Location</th>
<th>2020-2021</th>
<th>2021-2022 To Date</th>
<th>2021-2022 To Date</th>
<th>2021-2022 To Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Full Year Teacher/NFT Turnover #</td>
<td>Full Year Percentage of Total District Turnover</td>
<td>SYTD (6/1 to 10/11) Percentage of Total District Turnover</td>
<td>SYTD (6/1 to 10/11) Teacher/NFT Turnover #</td>
</tr>
<tr>
<td>Brien McMahon High School</td>
<td>12</td>
<td>13%</td>
<td>6</td>
<td>6%</td>
</tr>
<tr>
<td>Brookside Elementary School</td>
<td>1</td>
<td>1%</td>
<td>5</td>
<td>5%</td>
</tr>
<tr>
<td>Columbus Elementary School</td>
<td>4</td>
<td>4%</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td>Cranbury Elementary School</td>
<td>4</td>
<td>4%</td>
<td>1</td>
<td>1%</td>
</tr>
<tr>
<td>Fox Run Elementary School</td>
<td>5</td>
<td>5%</td>
<td>5</td>
<td>5%</td>
</tr>
<tr>
<td>Jefferson Elementary School</td>
<td>2</td>
<td>2%</td>
<td>6</td>
<td>6%</td>
</tr>
<tr>
<td>Kendall Elementary School</td>
<td>5</td>
<td>5%</td>
<td>3</td>
<td>3%</td>
</tr>
<tr>
<td>Marvin Elementary School</td>
<td>4</td>
<td>4%</td>
<td>4</td>
<td>4%</td>
</tr>
<tr>
<td>Naramake Elementary School</td>
<td>2</td>
<td>2%</td>
<td>5</td>
<td>5%</td>
</tr>
<tr>
<td>Nathan Hale Middle School</td>
<td>5</td>
<td>5%</td>
<td>14</td>
<td>15%</td>
</tr>
<tr>
<td>Norwalk Early Childhood Ctr</td>
<td>4</td>
<td>4%</td>
<td>2</td>
<td>2%</td>
</tr>
<tr>
<td>Norwalk High School</td>
<td>13</td>
<td>14%</td>
<td>5</td>
<td>5%</td>
</tr>
<tr>
<td>P Tech</td>
<td>3</td>
<td>3%</td>
<td>2</td>
<td>2%</td>
</tr>
<tr>
<td>Ponus Ridge Middle School</td>
<td>4</td>
<td>4%</td>
<td>5</td>
<td>5%</td>
</tr>
<tr>
<td>Roton Middle School</td>
<td>4</td>
<td>4%</td>
<td>10</td>
<td>10%</td>
</tr>
<tr>
<td>Rowayton Elementary School</td>
<td>3</td>
<td>3%</td>
<td>1</td>
<td>1%</td>
</tr>
<tr>
<td>Silvermine Elementary School</td>
<td>3</td>
<td>3%</td>
<td>1</td>
<td>1%</td>
</tr>
<tr>
<td>Special Education &amp; Pupil Pers</td>
<td>3</td>
<td>3%</td>
<td>4</td>
<td>4%</td>
</tr>
<tr>
<td>Tracey Elementary School</td>
<td>7</td>
<td>7%</td>
<td>8</td>
<td>8%</td>
</tr>
<tr>
<td>West Rocks Middle School</td>
<td>5</td>
<td>5%</td>
<td>7</td>
<td>7%</td>
</tr>
<tr>
<td>Wolfpit Elementary School</td>
<td>2</td>
<td>2%</td>
<td>2</td>
<td>2%</td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td><strong>95</strong></td>
<td><strong>96</strong></td>
<td><strong>94</strong></td>
<td></td>
</tr>
</tbody>
</table>

Source: NPS Human Resources Department, October 2021.
As shown, hiring efforts to fill vacancies that existed at the beginning of the school year and the new vacancies since the start of the school year significantly exceed the hiring efforts during the same period last year.

When asked about recruitment, the Director indicated that the Department has maintained a vacancy rate of between 40 and 60 positions over the last year. She said she felt the District has an effective recruitment process. But, as quickly as new people are hired, new vacancies occur. In her opinion, the greatest challenge is turnover and addressing turnover is a priority.

A number of studies have been done to estimate the cost of turnover in school districts. Both among teachers and principals as well as operational and leadership staff. Estimates place the dollar cost at between $20,000 and $50,000 based on the rank of staff. Direct costs include the cost of paying out leave and other balances, at the time of termination, and the cost of posting and advertising the position. In the case of leadership positions, the cost may include the cost of search firms, the cost of onboarding (screening, fingerprinting, assigning badges, etc.), and orienting and training the new employee. Indirect costs include a loss of productivity, negative impacts on student performance, negative impact on employee morale as a result of vacancies, and a host of other disturbing trends.

The two consistent recommendations for addressing turnover and improving retention are:

- tracking turnover and using the information to identify trends and reasons for the turnover; and
- exploring the conditions that are affecting turnover and deliberately taking action to address the root cause of the turnover.

As shown, NPS has successfully implemented the first of these recommendations.

As can be seen, the year-to-date turnover at some schools for this school year exceeds the full year turnover experienced the 2020-21 school year.

While the trends are troubling, tracking and maintaining the data are critical when formulating an appropriate response.

**COMMENDATION**

NPS is tracking turnover trends, particularly those for teachers, in an effort to plan for and stay ahead of the staffing needs of the schools.

**FINDING**

Major recruitment efforts are underway to ensure that vacancies are posted and disseminated to a wider audience.

Applitrack is the system used by NPS to post positions and receive applications. Simply posting a position has not in the past garnered the number or diversity of candidates needed to fill critical vacancies.
During interviews, staff stated that, during orientation, new hires are asked to provide information about how they heard about the job opening. Among recent hires, the billboards have been repeatedly mentioned as one of the ways they heard about the openings. Another recruitment effort not mentioned below is the use of radio ads. Tracking the results of each type of recruitment effort is a tool for determining whether to continue a program. Some critics have pointed out billboards, radio ads and other advertising efforts as costly.

As shown in **Exhibit 5-10** the total expended and budgeted between 2018-19 and 2021-22 has actually declined. The BOE Recommended Budget for 2022-23 would result in an increase if finally adopted.

### Exhibit 5-10
**Actual and Budgeted Advertising and Recruitment Expenditures**
*2018-19 through 2022-23 (Recommended Budget)*

<table>
<thead>
<tr>
<th>Account Description</th>
<th>2018-19 Actual</th>
<th>2019-20 Actual</th>
<th>2020-21 Actuals</th>
<th>2021-22 Revised Approved Budget</th>
<th>2022-23 Board of Education's Recommended Budget</th>
<th>$ Variance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Recruitment</td>
<td>$101,162</td>
<td>$82,810</td>
<td>$35,064</td>
<td>$34,553</td>
<td>$61,700</td>
<td>($39,462)</td>
</tr>
<tr>
<td>Advertising</td>
<td>$810</td>
<td>$795</td>
<td>$35,143</td>
<td>$52,100</td>
<td>$62,500</td>
<td>$61,690</td>
</tr>
<tr>
<td>Total</td>
<td>$101,972</td>
<td>$83,605</td>
<td>$70,207</td>
<td>$86,653</td>
<td>$124,200</td>
<td>$22,228</td>
</tr>
</tbody>
</table>

Source: Actual data provided by NPS, November 2021; Budgets extracted from BOE Approved 2021-22 and 2022-23 Budgets.

**Exhibit 5-11** provides a working document showing various options that are being used, tested or examined for future use. As can be seen, recruitment for Special Education is a serious concern for Norwalk Public Schools.
Exhibit 5-11
Working Summary of Recruitment Efforts

October 8, 2021

Special Education:
- Billboard Campaign: 10/25, 11/8, 11/15 - campaign will be active for 8 weeks from the start of each campaign. Two billboards will be on I-95 and Route 8 going Northbound and Southbound. (Cost: $20,400)
- Handshake- posting is active for 30 days – candidates who apply are redirected to Applitrack to apply
- LinkedIn- Website automatically broadcasts open vacancies from Applitrack and allows a candidate to apply directly through our platform.
- Indeed- Applitrack filters through Indeed to post all vacancies
- CT Reap- posted 9/27/2021 and is active for 60 days before renewal is needed.
- Therapy Travelers- Rate sheet received on 10/1. Rates vary depending on scope of contract, location, and duration of available therapists. (see attached document) - Is SPED interested in moving forward with this?
- OLAS- contact made with company on 10/7- OLAS is a yearly subscription application where your school district can post unlimited job postings during the year. Any job can be posted from Cleaners/Custodians to Teachers/Principals. Pricing is based on your student enrollment. - Response: The price for your district for a full year would be $6,500 plus 8.9% admin fee. Since this year has already started we can pro-rate to $4,875 plus 8.9% admin fee. I may be able to get October free also if you decide to join which would take another $542 off. - Is SPED interested in moving forward with this?
- CEA: open SPED vacancies submitted to CEA today 10/9/2021- pending approval from CEA team. Applicants will be redirect to apply on our platform.

Education Week (Top Jobs):
- Began one-year contract on 10/4/2021. Website automatically broadcasts open vacancies from Applitrack and allows a candidate to apply directly through our platform.
- Link: https://protecutus.nimecast.com/s/2928CVD2Pycn0QGc6kAZA?domain=topschooljobs.org/

College/Universities:
- Handshake platform, which we currently use to post vacancies, are used by major universities. Students are redirected on Student Career pages to use Handshake as their tool for employment opportunities. Our school vacancies are posted on Handshake.
  - Schools reached out to Binghampton, Uconn, CCSU, Southern CT, Fairfield, Manhattanville, Sacred Heart and Hunter College

Source: NPS Human Resources Department, October 2021.

Many on-site Job Fairs and college visits have been curtailed during COVID, but continue to be a valid process for meeting and pre-screening candidates for critical vacancies. According to staff, in April 2022, NPS will be holding an in-person Job Fair which was advertised using the Handshake platform mentioned above.

COMMENDATION

NPS is using social media, radio ads, billboards, and a number of other innovative approaches to recruit candidates for open positions and has a process in place to evaluate the effectiveness of these efforts.

FINDING

The posting and filling of vacancies is initiated and driven by the hiring department with support from Human Resources staff.
NPS allocates positions in the budget using the position control functions in MUNIS. All schools and departments have a budget, and the allocated positions are stipulated in their budget. When a vacancy occurs or a new position is requested, the school or department enters a request into the Frontline AppliTrack (AppliTrack) application, which is the talent acquisition system used by NPS to post vacancies.

Once a request is entered into AppliTrack, the first approver is the Finance Department to make sure they have money for that position. Once the Finance Department has confirmed the availability of money in the budget, HR staff check to see if a new job description is needed prior to posting.

Because many of the union contracts require an internal posting for a given number of days prior to posting the position externally, there is a function in the system where the requesting school or department enters the number of days for the posting to be internal. HR staff check to make sure that the number of days is correct, based on the employee group and when those days have lapsed, the system will post externally.

Internal candidates complete a separate internal application, and the principal or department head examine the applications from the internal pool of candidates, schedules interviews with them directly, and will notify HR when and if they are ready to make an offer. If there is no qualified candidate in the internal pool, the principal or department head must write a justification explaining why the internal candidates were not hired, and should a grievance or complaint be filed, this documentation would provide support for that decision. Once the internal posting requirement is met, the job posting is opened to external candidates.

AppliTrack does an internal pre-screening based on required qualifications that were entered into the system at the time the job descriptions were loaded into the system. In some shortage areas, HR staff stated that they will also do some screening and pass that information along to the principals. If no qualified applicants are found for a particular job they will go out on social media and try to generate interest. Each of these social media posts refer the job seekers back to the NPS website.

The principal or department head sets up interviews and establishes a selection committee for the positions made up of individuals with knowledge and expertise in the position that is being filled. HR staff are not normally involved in the interviews or selection committees unless there is a need for an extra person on a committee.

Once someone is selected, the principal or department head checks references and fills out a new hire recommendation form. They generally recommend a second choice in case the person does not accept the offer. HR staff verify the candidate’s education and experience level, determine the applicable salary and contact the candidate and make the offer. Contact is made in person and an offer letter is sent through AppliTrack. New hire paperwork is also sent through AppliTrack and the employee-elect completes the paperwork and is directed to complete some mandatory training such as Sexual Harassment online. The employee-elect has to come into the office to do the fingerprinting and complete some of the final paperwork.

HR staff send the fingerprints to the State. The applicant has to pre-enroll in the state system and pay a fee for the service; the reports are sent to the Benefits Manager.
The Finance Department enters the information into MUNIS to set up the new employee. Orientation is held every Tuesday, and during peak periods, orientation is held on Tuesday and Thursday.

COMMENDATION

The decentralized process for posting and filling vacancies gives principals and department heads more control over the posting and selection processes; control and monitoring throughout is provided by Human Resources and Finance.

FINDING

NPS is using a number of surveys to address retention issues.

As discussed above, two consistent recommendations for addressing turnover and improving retention are:

- tracking turnover and using the information to identify trends and reasons for the turnover; and
- exploring the conditions that are affecting turnover and deliberately taking action to address the root cause of the turnover.

Annually, NPS conducts Family, Student and Teacher and Staff Surveys in an effort to determine each groups perceptions of their schools and their overall attitudes about the teaching and learning environment. NPS has been using the Panorama Survey for three years. Prior to that, the district used the CSCI (Comprehensive School Climate Inventory) survey.

All of the surveys ask specific questions about the school environment that could be predictors of turnover by identifying areas of dissatisfaction. All surveys are anonymous and responses are gathered on-line in an effort to encourage open and honest responses.

Students are asked about their classrooms, their teachers and about their fellow students and how bullying and other behavior matter are handled. Negative response trends at specific schools, grade levels, or classrooms could help to identify hostile or unhealthy environments.

Families are asked more detailed, but similar questions regarding their relationship with teachers and other staff, overall school environments, school safety and school communication. Again, positive and negative response trends provide valuable information.

Since reducing teacher and staff turnover is one of the objectives, the results of the Teacher and Staff surveys provide more granular information regarding the employee’s attitudes about the work environment. The survey categories include:

- Teaching Environment - perceptions of the teaching environment, both inside the classroom and at the school more generally
Human Resources  Evergreen Solutions, LLC

- Leadership - feedback on the leadership at the school
- Educating All Students - attitudes about working with different populations of students
- Working with Families - feedback regarding working with student families
- General Perceptions of Teaching - ability to improve different aspects of teaching over time

Exhibit 5-12 provides an excerpt of the Spring 2021 Teacher Survey.

Exhibit 5-12
Results of Teacher Survey Spring 2021

According to the Assistant Superintendent of Schools, the response data are reviewed by the Director of Testing and Accountability, the Director of School Improvement, the Education Administrator for School Counseling, the Assistant Superintendent of Schools, and the Executive Directors of Leadership Development. This is also shared, analyzed, and discussed in Cabinet.

At the same time, each principal reviews the responses with their Instructional Leadership Team and creates goals based on the data. A portion of the principal’s evaluation is tied to the survey.
COMMENDATION

NPS is effectively using the results of the annual Panorama Surveys to identify predictive issues affecting staff turnover.

5.5 LABOR RELATIONS

The majority of NPS employees are represented by eight bargaining groups (Exhibit 5-13).

Exhibit 5-13
Employee Bargaining Units

<table>
<thead>
<tr>
<th>Bargaining Group</th>
<th>Positions Served</th>
<th>Contract Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>United Public Service Employees Union</td>
<td>Custodians, Maintenance Mechanics, Truck Drivers, Mail Clerk, Pool Custodian,</td>
<td>7/1/20 to 6/30/25</td>
</tr>
<tr>
<td></td>
<td>Maintenance Mechanics, Truck Drivers, Mail Driver, Mail Clerk, Porter, Transportation Drivers, Security Staff and Painters</td>
<td></td>
</tr>
<tr>
<td>Executive Support Group</td>
<td>Employees identified in the Connecticut State Board of Labor Relations Case No. ME 14,504 who are employed by the Board of Education of the City of Norwalk, excluding the Executive Assistant to the Superintendent, Executive Assistant to the Chief Financial Officer, Executive Assistant to the Chief Talent/Human Resources Officer, the Executive Assistant to the Chief of School Operations and the Executive Assistant to the Board of Education.</td>
<td>7/1/2019 to 6/30/2022 (Negotiations Underway)</td>
</tr>
<tr>
<td>Food Services</td>
<td>All persons employed as Food Service Employees of the Norwalk Board of Education with the exception of Secretaries, Bookkeepers, Assistant Director, Director and Director of Distribution Services</td>
<td>7/1/20 to 6/30/25</td>
</tr>
<tr>
<td>Norwalk Association of School Administrators</td>
<td>Defined in §§10-153b through 10-153f of the Connecticut General Statutes as amended, for all administrators and supervisors, functioning in positions requiring certification, exclusive of Central Office administrative staff</td>
<td>7/1/22 to 6/30/25</td>
</tr>
<tr>
<td>Norwalk Federation of Educational Personnel (Non-exempt and Board-Certified Behavior Analysts (BCBA))</td>
<td>Library Media Assistant, Secretaries, Health Services Assistants, Office Assistant, Tutors, Teacher Assistant, Registered Behavior Technician, Human Resources Technician, Student Information System Assistant, Account Payable Assistant, Admin. Secretary, Account Specialist, Executive Secretary, Extended Learning Program Coordinator, Human Resources Benefits Specialist, Student Information Systems Specialist, Transportation Coordinator, Board Certified Behavior Analyst (BCBA)</td>
<td>7/1/2020 to 6/30/2023</td>
</tr>
<tr>
<td>Connecticut Health Care Associates</td>
<td>Registered Nurses, Occupational Therapists and Physical Therapists</td>
<td>9/1/2019 to 8/31/2022 (Negotiations Underway)</td>
</tr>
<tr>
<td>Norwalk Federation of Teachers</td>
<td>All members of the teacher’s unit as defined by Conn. Gen. Stat. § 10-153(b).</td>
<td>9/1/2020 to 8/31/2023</td>
</tr>
<tr>
<td>United Federation of Technicians</td>
<td>IT Technicians, IT Specialists (includes, but not limited to, Network Managers, Software Analysts, Systems Analysts, Web Developer, AV Analyst</td>
<td>7/1/2019 to 6/30/2022 (Negotiations Underway)</td>
</tr>
</tbody>
</table>

Source: Compiled by Evergreen through interviews and a review of bargaining agreements, December 2021.
The Board has the law firm of Shipman and Goodwin on retainer, and this firm coordinates and leads all union negotiations. The Director of Human Resources also participates in all negotiations. The newly hired Labor Relations and Legal Counsel position is currently involved in creating and maintaining the Memoranda of Understanding and will likely be involved in future contract negotiations.

**FINDING**

The Director of Human Resources and the Labor Relations/Legal Counsel positions hold consultation sessions with each of the union presidents to discuss emerging issues.

Several of the bargaining agreement include a requirement for monthly meetings; however, the consultation meetings are being approached by the administration as an opportunity to work more collaboratively with each group.

For example, during these confidential sessions with each president, discussions may center on a specific member that may be experiencing performance issues or focus on a range of general issues. In January, administrators indicated that they are meeting to seek input on the job descriptions for the positions at the new schools.

**COMMENDATION**

NPS is meeting in consultation with each of the union presidents in an effort to improve the relationships and to encourage their involvement.

**5.6 PERFORMANCE EVALUATIONS**

When properly managed, fair, honest and constructive employee performance evaluations can build trust, provide employees an opportunity for growth and open lines of communication between management and employees. In a unionized environment, many employees feel that seniority is the only way to move ahead in the organization; good work goes unnoticed, and poor performers are rewarded with the same compensation and benefits as those who are going the extra mile. To mitigate this employee morale challenge, it is important that management understand that all employees want and need feedback to affirm their value to the organization. While a performance evaluation can provide a level of documentation needed for disciplinary actions, the evaluation and goalsetting process should provide management and the employee an opportunity to discuss ways to continually improve performance.

**FINDING**

Although all NPS bargaining agreements contain language to the effect that no employee may be dismissed unless for just cause, not all agreements grant explicit authority to management to conduct annual performance evaluations or discipline, demote or fire employees based on poor performance.
**Exhibit 5-14** provides a summary of the references to performance evaluations and discipline in each of the bargaining agreements.

**Exhibit 5-14**  
Reference to Performance Evaluations and Disciplinary Actions

<table>
<thead>
<tr>
<th>Bargaining Group</th>
<th>Performance Evaluation</th>
<th>Discipline Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>United Public Service Employees Union</td>
<td>Implied – promotions are to be based on performance evaluations</td>
<td>None</td>
</tr>
<tr>
<td>Executive Support Group</td>
<td>Yes – Management has the right</td>
<td>Yes – Management has the right</td>
</tr>
<tr>
<td>Food Services</td>
<td>None</td>
<td>Yes – Management has the right</td>
</tr>
<tr>
<td>Norwalk Association of School Administrators</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Norwalk Federation of Educational Personnel (Non-exempt and Board-Certified Behavior Analysts (BCBA))</td>
<td>Yes - Each employee covered by this Agreement shall be evaluated annually by his/her immediate supervisor. This evaluation shall be in writing and shall be discussed at an individual conference and not while the employee is involved in the performance of his/her job. A copy of the written evaluation shall be given to each employee at the end of the conference and shall be made part of the employee's personnel file.</td>
<td>Yes</td>
</tr>
<tr>
<td>Connecticut Health Care Associates</td>
<td>Yes - All newly appointed staff members will receive an annual evaluation for a two (2) year probationary period. This evaluation process for non-probationary staff members shall be done at least every other year.</td>
<td>Implied</td>
</tr>
<tr>
<td>Norwalk Federation of Teachers</td>
<td>Yes – State Statute</td>
<td>Yes – State Statute</td>
</tr>
<tr>
<td>United Federation of Technicians</td>
<td>Implied</td>
<td>Yes – Management has the right to select, hire, and demote members, including the right to prescribe and enforce reasonable rules and regulations for the maintenance of discipline and for performance of work</td>
</tr>
</tbody>
</table>

*Source: Compiled by Evergreen from Bargaining Agreements, January 2021.*

School Board Policy 4115 – Evaluation and Support Program, speaks extensively to the teacher performance evaluation process and the many ways in which teachers are provided support in order to assure their success in the classroom. The process is prescribed in state and federal law primarily because:

- legislators recognize that for teachers to be successful, they need support; and
- because teachers leave the profession when they do not get the support they need to be successful. In other words, the teacher evaluation system is not a tool for getting rid of teachers, but for retaining them.
Applying this same concept to the performance evaluation and the discipline management processes for all employees would require a carefully designed and administered evaluation instrument and processes, training for supervisory personnel on the process and a commitment from management and staff that continual improvement is possible.

**RECOMMENDATION**

Recommendation 5-4:

Develop language that gives management the authority to implement a fair, honest and open performance evaluation system that emphasizes the goal of continual improvement, as union contracts are renegotiated.

The development of an evaluation system can start immediately in collaboration with the unions that already have such clauses in their agreements and could provide the groundwork for changes to other agreements once they can see the plan in action,

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.
CHAPTER 6:
INFORMATION TECHNOLOGY
## 6.0 SCHOOL INFORMATION TECHNOLOGY

Instructional technology is a primary vehicle for informing innovative design for learning. Wayne State University describes it as considering “instruction from the perspective of the learner rather than from the perspective of the content, the traditional education and training approach.” It provides a means of enabling staff and students to become life-long learners. While it involves technological tools, it is about their use and seamless integration into teaching, learning, and assessment—not stand-alone tools. Having a current approach to instructional technology enables a school district to offer students and staff opportunities to continually learn and embrace new technologies they will utilize in school and in life.

Educational technology broadens student abilities to learn whenever and wherever they are. The recent COVID-19 pandemic only accelerated a trend already present within most classrooms and schools. Learning through the use of technology can occur in or out of the classroom. It can be self-paced, asynchronous learning or it may be synchronous and teacher or student-led instruction. It is applicable to both distance learning and in conjunction with face-to-face learning, as blended learning.

More recently, instant connectivity has transformed from a tool of personal communication to a platform for learning and student engagement. The proliferation of social media not only created new platforms for learning and interaction for students, but also for teachers and parents. It is common now for teachers to use social media to communicate directly with students, conduct forum-style student sessions, and facilitate one-on-one interaction to resolve student questions and concerns.

The upcoming years have the potential to witness even more exciting transformation of learning. Some of the advancements identified by Purdue University’s research that stands to impact classrooms in the new future include:

- **Biometrics**, a technology that recognizes people based on certain physical or behavioral traits, is on the technological horizon. The science will be used to recognize the physical and emotional disposition of students in the classroom, altering course material to tailor to each individual’s needs based on biometric signals.

- A second up-and-coming technology is **Augmented Reality (AR) glasses**, rumored to be on Google’s release list, and this technology could be a whole new world for education. AR Glasses (or even contact lenses) will layer data on top of what we naturally see, to allow for a real-world learning experience. For example, a student wearing AR Glasses could potentially sit at his desk and have a conversation with Thomas Edison about invention.

- **Multi-touch surfaces** are commonly used through equipment such as the iPhone, but the technology could become more relevant to education through entirely multi-touch surfaces, such as desks or workstations. This could allow students to collaborate with
other students, even those around the world, and videos and other virtual tools could be streamed directly to the surface.

The NPS Technology Department will be leading these and similar transformations in NPS classrooms. Currently, it is responsible for daily operations of the Wide Area Network (WAN), hardware and software support, technical training, and web services as well as providing school-based instructional technology support. The State of Connecticut goal of the NPS Technology Department lays out its mission as well as the intent of NPS as a driver of student success within the communities it serves.

Language for the departmental goal encompasses:

...to enrich the lives of students by empowering teachers to use classroom technologies to enhance instruction and improve achievement." As a matter of necessity, each student in Norwalk must be prepared to meet the technological challenges of our contemporary society. In order to ensure that we provide the best possible education for our students, we must seamlessly infuse technology at all grade levels. We must also ensure that our graduating seniors have the skills necessary to be successful in today's technology-driven, global workforce.

In order to accomplish this goal, the Technology Department uses a variety of tools and techniques to:

- implement professional development for staff (teachers and administrators);
- ensure that students receive both direct and indirect instruction in the use of computer technology; and
- assess student technology proficiency and align future actions.

Clearly, the NPS Technology Department recognizes the importance of technology in the educational experience as well as student success. While a variety of approaches could be utilized to evaluate the current status and progress of the department and its efforts, this chapter focuses on three elements of successful management instead of specific tools and technologies:

6.1 Organization and Management
6.2 Strategy
6.3 Operations

6.1 ORGANIZATION AND MANAGEMENT

The NPS Technology Department stands out as a leader in technology accessibility and instructional resources among districts its size. The present Assistant Superintendent of Digital Learning and Innovation has made great strides in planning as well as implementation of both administrative and instructional technology assets with a limited budget and staff.

Some examples of recent accomplishments include:
- encouraging the integration of technology into the classroom;
- implementing a 1:1 device ratio for students;
- supporting student learning during the COVID-19 pandemic;
- identifying sources of funding to meet service delivery challenges; and
- leveraging data to align best practices with operational needs.

Exhibit 6-1 shows the organizational chart for the department. Currently, the organizational structure is divided among technology support, the student information system, enterprise support, and digital learning. By design, this structure—while affording opportunities for collaboration—concentrates technology support, data management, and instructional support in teams. Structurally, this design allows for resource sharing while maintaining specialization within key sub-functional areas. For example, data from the Student Information System (SIS) might be useful in the instructional coach planning processes, so the specialized data and analysis skills, while concentrated with the SIS can be leveraged to support the coaching unit.

Exhibit 6-1

NPS Technology Department Organizational Chart

Source: Created by Evergreen, December 2021.
The change in FTE approved for the NPS Technology Department from FY21 and FY22 budget appears in Exhibit 6-2 as well as the national benchmark for the ratio of IT staff to users in similar-sized organizations. This simple comparison reveals a gap of at least four FTEs. However, it is important to note that several factors impact the appropriate benchmark level—such level of digital transformation, service demand, and commitment to student success.

**Exhibit 6-2**
Approved FTEs for FY20 and FY21 and National Benchmark

![Graph showing FTE comparison](image)

Source: FY22 NPS Approved Budget and OD Tech benchmarking, 2021.

**FINDING**

In comparison to national peers, the NPS Technology Department possesses less staff as well as financial resources to meet a growing need for services. The Department engaged Gartner to conduct a comprehensive benchmark study based on the IT Budget Enterprise Comparison Tool and the results of this comparison provides the basis for the elements of this finding. For comparison purposes, the analysis included educational organizations in the under $250 million and $1 to $10 billion revenue categories.

When comparing the cost of IT as a percentage of operating expenses in the smaller peer category (under $250 million), a sizable gap appears in the magnitude of available resources (see Exhibit 6-3). In essence, NPS has been able to deliver services similar to its peers with less resources. It should however be noted that the Gartner report only includes technicians and NPS recognizes the Instructional Coaches in their staffing calculations.
When examining how the limited available resources have been allocated from a budgetary standpoint, there is more concentration on software and Software as a Service (SaaS) as shown in Exhibit 6-4. It is important to note that, given the limited staff and resources as well as the increasing availability of educational software, the emphasis on SaaS aligns well with business needs.

When examining staff more specifically, the percentage of technology staff compared to overall staffing demonstrates another sizable gap (Exhibit 6-5). NPS possesses less than one percent of overall staff in IT compared to a peer average of 4.5 percent. While the numerator and denominator play a role in the percentage, assuming a constant level of overall staffing, the current IT workforce would need to more than triple to approximate the peer average.
It is important to keep in mind that the sample use by Gartner possesses some operational variation in technology strategy and utilization. However, the differential clearly points to the Department doing more with less compared to its peers. In addition, this result further supports the strategy of using SaaS as the primary software approach so that application development and support staff are not needed at the same level as in organizations that develop more software, internally.

When examining the allocation of staff by functional area in comparison to overall IT staff, the current placement of emphasis and pattern of need becomes more into view. Exhibit 6-6 illustrates the concentration in end-user and application support.

**Exhibit 6-5**
Comparison of IT Staff to Total Staff

Source: Gartner, 2021.

**Exhibit 6-6**
Percentage of IT Staff by Functional Area

Source: Gartner, 2021.
Given the limited resources available and the growing need for service, the NPS Technology Department would benefit by capitalizing on some of the redundancy that exists between services offered by the City and NPS. Both departments maintain networks, address customer technical issues, and provide application support. While the City is at a different digital transformation point than NPS, it possesses skilled technicians and a relatively small level of demand compared to Norwalk Public Schools.

RECOMMENDATION

Recommendation 6-1:

Develop a collaborative approach for providing technical support to NPS and City users.

While collaboration can afford mutual value across participants, it is critical that the design and implementation of the collaboration reduce risk and accommodate different viewpoints and needs.

A common process for developing a collaborative approach involves the following:

- designating a team to lead the collaboration effort;
- identifying mutual and unique goals;
- assessing the current state;
- predicting future needs;
- determining the appropriate path to implementation;
- developing a transition plan; and
- managing change.

Collaboration on the upgrades to MUNIS, for example, have already begun. A joint committee made up of representatives from NPS and the City are working together to determine the functionality needed by both parties since this system is shared and critical to both.

Based on City and NPS data, this collaboration would not reduce staffing levels, but it would provide a more comprehensive level of service to customers, increase overall technical capability, and create opportunities for cross-training. Once implemented, the collaborative effort could reduce workload for some staff and allow for task redeployment. Moreover, this approach might reduce some of the 1,173 hours of overtime accrued in 2020-21.

FISCAL IMPACT

This recommendation can be implemented with existing staff and resources.

FINDING

School facilities lack sufficient staffing and support to develop comprehensive education technology services and the issue will only increase as more technology is leveraged to increase student success. Currently, instructional coaches work within the K-8 buildings. Three of the
four middle schools have a full-time coach for their building for 37.5 hours a week. High school and the smaller middle school each have about 11 hours of coaching per week which significantly limits the instructional technology resources available to students as well as teachers.

While NPS possesses a variety of technology staffing needs based on review of the Gartner benchmark comparison, the area of paramount concern pertains to providing sufficient educational as well as support technology resources in each school.

Instructional coaches are critical to student success due to their role in:

- aligning technology with learning goals;
- ensuring comprehensive tool sets are available and understood by teachers;
- developing teacher skills and capabilities;
- educating students in the use of available technology;
- linking the efforts of teachers with administrator goals;
- formulating future needs before they are required; and
- providing technical support and ensuring appropriate use of available devices.

Similarly, the expansion of technology resources and utilization necessitates technical support to ensure operational success. Some benefits of comprehensive technical support resources include the following:

- enhancing communication with stakeholders, including administrators, teachers, parents, and students;
- building utilization of technology in the classroom;
- optimizing hardware;
- updating equipment to meet stakeholder service needs;
- providing comprehensive technical support; and
- assisting with preventive maintenance.

In order to better serve the students of NPS, the ratio of coaches to facilities needs to be reduced and technical support staff should be added.

**RECOMMENDATION**

**Recommendation 6-2:**

**Hire three additional full-time Instructional Coaches to support educational technology and one additional full-time IT Technician.**

By increasing the available staff by four, NPS could ensure that an instructional coach is available at all facilities at least once per day and one additional field technician can enhance the
level of customer support. An increased level of availability would not only address technical issues that inhibit classroom utilization, but would further accelerate the integration of instructional technology, thus increasing student success.

**FISCAL IMPACT**

NPS currently compensates Instructional Coaches on average $80,000 annually plus 30 percent for benefits or approximately $104,000. Similarly, IT Technicians receives a base compensation of $57,089 or $74,216 with benefits. The annualized cost of hiring three new coaches and one new IT Technician totals $386,216.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hire Three Additional Full-Time Instructional Coaches</td>
<td>($386,216)</td>
<td>($386,216)</td>
<td>($386,216)</td>
<td>($386,216)</td>
<td>($386,216)</td>
</tr>
</tbody>
</table>

6.2 **STRATEGY**

Like many school district technology functions, trends present before COVID-19 accelerated as student, teacher, and community needs grew dramatically during the crisis. Four of the biggest challenges experienced by school districts pertain to:

- addressing the increase in the demand for technology usage with limited staff resources;
- accommodating more network usage as device counts and access increased;
- bridging the student, teacher, and parent gaps in effective technology utilization; and
- balancing the cost of new technology and enhancing instructional resources.

The difference between being successful in this new and challenging environment and losing the ability to impact positive change is a comprehensive plan. Effective plans ensure that limited resources can be prioritized for the projects and initiatives that provide the greatest benefit to student success. Most IT plans are three- to five-year plans and contain specific goals and objectives that will assist in leading an organization from its current state to the desired future. While plans vary in specificity, most specific plans tend to be more beneficial in moving educational organizations forward providing detailed costs, resources, and timeframes.

**FINDING**

While the NPS Technology Department operates in a strategic manner and possesses a number of noteworthy accomplishments, it would be beneficial to develop a formal educational technology plan. By collaboratively designing the path forward, different financial resources, partners, and innovations can be vetted and linked to the appropriate goal and objective. Moreover, given the recent emphasis of this area to develop more community or even national partnerships, this step would be beneficial in not only guiding internal decisions, but communicating with potential external partners.
Some common sections in an education technology plan includes:

- Description of District
- Mission Statement
- Background
- Guiding Documents and Policies
- Technology Planning Team
- Infrastructure
- Curriculum Integration
- Collaborations
- Professional Development
- Supporting Resources Projected Cost
- Coordination of Resources
- Evaluation of Progress
- Responsible Use Policy

**RECOMMENDATION**

**Recommendation 6-3:**

**Develop and implement a three-year Education Technology Plan.**

While the specific process and resources for developing the plan should be determined by NPS leadership, the content of the plan should include the following key elements:

- planning process and methodology;
- current technology and resources;
- curriculum and instruction integration goals;
- student technology literacy goals;
- staffing training and professional development;
- technology goals;
- partnerships and collaboration;
- budget; and
- measurement and evaluation.

**FISCAL IMPACT**

This recommendation can be implemented with existing staff and resources.

**6.3 OPERATIONS**

Technology in a school district setting serves as an enabling force for enhancing customer service, improving the efficiency of processes, and integrating diverse resources. Through these elements as well as efforts by other stakeholders, a district improves student success. While a variety of technical elements could be evaluated as part of operations, three high-level sub-themes within operations are analyzed as part of this review:
6.3.1 Accessibility
6.3.2 Skill and Knowledge
6.3.3 Support

6.3.1 Accessibility

Access to technology is not the end game of technology management, but the starting point. Without the appropriate technology, learning is inhibited, data are underutilized, and processes rarely improve in a substantive way.

FINDING

The NPS Technology Department embraced the challenge of ensuring that at least one device is available to every student. **Exhibit 6-7** captures the total devices, student population, and device per student ratio for the 19 supported locations. Based on this estimate, support staff are responsible for maintaining a total of 20,933 devices that include the teacher computers, phones, networking equipment and interactive whiteboards.

**Exhibit 6-7**
Summary of Total Devices and Students Per School Site
2021

<table>
<thead>
<tr>
<th>School</th>
<th>Total Devices *</th>
<th>Student Population</th>
<th>Device Per Student</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brien McMahon/Center for Global Studies</td>
<td>4,014</td>
<td>1,935</td>
<td>2.07**</td>
</tr>
<tr>
<td>Brookside Elementary</td>
<td>1,090</td>
<td>439</td>
<td>2.48**</td>
</tr>
<tr>
<td>Columbus Magnet</td>
<td>777</td>
<td>301</td>
<td>2.58**</td>
</tr>
<tr>
<td>Cranbury Elementary</td>
<td>1,006</td>
<td>417</td>
<td>2.41**</td>
</tr>
<tr>
<td>Fox Run Elementary</td>
<td>1,003</td>
<td>366</td>
<td>2.74**</td>
</tr>
<tr>
<td>Jefferson Elementary</td>
<td>1,301</td>
<td>427</td>
<td>3.05**</td>
</tr>
<tr>
<td>Kendall Elementary</td>
<td>1,002</td>
<td>425</td>
<td>2.36**</td>
</tr>
<tr>
<td>Marvin Elementary</td>
<td>1,255</td>
<td>406</td>
<td>3.09**</td>
</tr>
<tr>
<td>Naramake Elementary</td>
<td>987</td>
<td>364</td>
<td>2.71**</td>
</tr>
<tr>
<td>Nathan Hall Middle</td>
<td>1,588</td>
<td>547</td>
<td>2.90**</td>
</tr>
<tr>
<td>Norwalk Ealy Childhood Center</td>
<td>97</td>
<td>156</td>
<td>0.62***</td>
</tr>
<tr>
<td>Norwalk High/P-Tech Norwalk</td>
<td>4,025</td>
<td>1,905</td>
<td>2.11**</td>
</tr>
<tr>
<td>Ponus Ridge Middle</td>
<td>1,865</td>
<td>677</td>
<td>2.75**</td>
</tr>
<tr>
<td>Rotom Middle</td>
<td>1,027</td>
<td>548</td>
<td>1.87**</td>
</tr>
<tr>
<td>Rowayton Elementary</td>
<td>1,044</td>
<td>467</td>
<td>2.14**</td>
</tr>
<tr>
<td>Silvermine Elementary</td>
<td>1,285</td>
<td>463</td>
<td>2.78**</td>
</tr>
<tr>
<td>Tracey Elementary</td>
<td>1,059</td>
<td>463</td>
<td>2.29**</td>
</tr>
<tr>
<td>West Rocks Middle</td>
<td>2,060</td>
<td>719</td>
<td>2.87**</td>
</tr>
<tr>
<td>Wolfpit Elementary</td>
<td>817</td>
<td>328</td>
<td>2.49**</td>
</tr>
</tbody>
</table>

Source: NPS Technology Department, 2021.

* This includes staff, lab and classroom-based devices (numbers include switches, phones, and other devices).
** All students have a device to take home. Some additional classroom-based devices are also available
*** This is a pre-k program. Students do not have an assigned device.

The calculated device per student shown in the chart includes classroom specific computers as well as many other peripheral devices that are also supported by the department; however, NPS has achieved its goal of providing each student a device to take home, with the exception of Pre-K 4 students that are not provided devices to take home.
COMMENDATION

Each student in Norwalk Public Schools has at least one device for learning and instruction.

6.3.2 Skill and Knowledge

If technology tools are available, then the knowledge and skills necessary for efficient and effective utilization turn availability into desired outcomes. Within education, students, teachers, and parents all need to possess the technical skills necessary to maximize the tools available. The NPS Technology Department is committed to ongoing development of all three groups.

FINDING

NPS recognizes the importance of parental technical capability in student success. The COVID-19 pandemic brought further to light the importance of ensuring that parents have a basic level of technical literacy to support their student’s learning process in an age where more technical tools assist with learning as well as communications between teachers and parents. The NPS Technology Department established the Parent University to give parents the chance to attend collaborative learning sessions with their students. The content focuses on access and use, safety, and support in a hybrid classroom environment.

As shown in Exhibit 6-8, the Parent University access page provides easy access to content on a variety of relevant topics. Ease access and use as well as relevancy impact overall utilization as well as student success.
Exhibit 6-8
Access Page for Parent’s University

Norwalk Public Schools is proud to launch Parent University, a virtual learning experience for parents, guardians, and all Norwalk community members.

Parent University is designed to help parents learn skills to work with their students and help them achieve. Our mission is to provide parents and families with experiences to create a lasting learning partnership that will transfer to positive outcomes for our students.

How Does Parent University Work?
Families enrolled in Parent University have the opportunity to attend collaborative learning sessions with their students.

Sessions are designed to be either LIVE presentations with Q&A or pre-recorded informational sessions about the various technologies and activities students are using at Norwalk Public Schools. All sessions are designed to be family oriented and attended by all members of the family.

Sessions begin on August 17 and run from 6:00 - 6:45 p.m. or 7:00-7:45 p.m.

- August 17
  - Symphony Math for Grades K-5
- August 18
  - Supporting your K-2 Students in Writing
  - Supporting your 3-5 Students in Writing
- August 19
  - Seesaw: Digital Portfolios for K-5 Students
  - Google Classroom: An Introduction for K-12 Parents
- August 20
  - Flipgrid: Interactive Video Application for K-12 Students
- August 25
  - Supporting your K-1 Students in Mathematics
  - Supporting your 2-3 Students in Mathematics
- August 26
  - Nearpod: Interactive Lessons for K-12 Classrooms
  - An Introduction to Student Devices (Chromebooks/Laptops)

For more information, please visit www.NPSParentUniversity.org, our new Parent University homepage.

Source: NPS Website, 2022,
Exhibit 6-9 demonstrates the level of usage of the site. While these statistics do not account for unique users, it provides a strong indication that Parent’s University met a primary need. Similarly, when examining the type of content accessed, math and writing assistance attracted some of the highest levels of interest, as shown in Exhibit 6-10.

Exhibit 6-9
Parent University Usage Statistics,
2020-2021

<table>
<thead>
<tr>
<th>Resource</th>
<th>Individual Users</th>
<th>Page Views</th>
</tr>
</thead>
<tbody>
<tr>
<td>Parent University Google Site</td>
<td>2,300</td>
<td>5,193</td>
</tr>
<tr>
<td>Parent Resource Google Site</td>
<td>34,000</td>
<td>52,000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>36,300</strong></td>
<td><strong>57,193</strong></td>
</tr>
</tbody>
</table>

Source: NPS Technology Department, 2021.

Exhibit 6-10
Parent University Session Usage Statistics
2020-2021

<table>
<thead>
<tr>
<th>Session Title</th>
<th>Total Registered</th>
<th>Total Attended</th>
<th>Website Hits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Symphony Math</td>
<td>163</td>
<td>93</td>
<td>58</td>
</tr>
<tr>
<td>K-2 Writing</td>
<td>116</td>
<td>59</td>
<td>46</td>
</tr>
<tr>
<td>3-5 Writing</td>
<td>77</td>
<td>33</td>
<td></td>
</tr>
<tr>
<td>Seesaw</td>
<td>128</td>
<td>57</td>
<td>117</td>
</tr>
<tr>
<td>Google Classroom for Parents</td>
<td>138</td>
<td>49</td>
<td>131</td>
</tr>
<tr>
<td>Flipgrid</td>
<td>119</td>
<td>39</td>
<td>60</td>
</tr>
<tr>
<td>K-1 Math</td>
<td>70</td>
<td>23</td>
<td>35</td>
</tr>
<tr>
<td>2-3 Math</td>
<td>67</td>
<td>19</td>
<td></td>
</tr>
<tr>
<td>Nearpod</td>
<td>139</td>
<td>32</td>
<td>31</td>
</tr>
<tr>
<td>Using Student Devices</td>
<td>87</td>
<td>22</td>
<td>110</td>
</tr>
<tr>
<td>K-2 Reading</td>
<td>48</td>
<td>13</td>
<td>35</td>
</tr>
<tr>
<td>3-5 Reading</td>
<td>33</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>1185</strong></td>
<td><strong>448</strong></td>
<td><strong>623</strong></td>
</tr>
</tbody>
</table>

Source: NPS Technology Department, 2021.

COMMENDATION

The Parent University is providing valuable services to parents in Norwalk Public Schools.

FINDING

The Technology Department and school-based instructional coaches have developed a long-term approach to embedding technology into instruction at all levels of education. By placing an emphasis on not only access, but also utilization, student interactions, engagement, and learning increases.

One example of these efforts is the Digital Citizenship Curriculum. Students in Grade K-8 participate in a pre-assessment process to determine how much information they know about being a good Digital Citizen. The Grade 3 Pre-Assessment appears in Exhibit 6-11.
Exhibit 6-11
Excerpt from Digital Citizenship Pre-Assessment (Grade 3)

Source: NPS, 2022 Digital Citizenship site.
A good digital citizen is defined as “one who has the knowledge and skills to navigate information effectively and safely.” After the pre-assessment, students engage in four to seven lessons per grade level. A post-assessment aligned with the pre-assessment occurs later in the year to determine effectiveness.

COMMENDATION

Purposeful planning for technology integration into instruction, recognition of the role it can and should play in student learning, and forward thinking in making technology use user-friendly are commendable.

6.3.3 Support

Obtaining and initially integrating technology is a critical first step to improving student outcomes; however, supporting the utilization of these resources is an ongoing and often times, costly process. In some cases, providing the technology overshadows maximization of us. This results in not only frustration for students, parents, and administrators, but also missed opportunities.

FINDING

Any 1:1 device initiative possesses inherent challenges for students, teachers, and administrators and the NPS Technology Department anticipated issues and planned accordingly. The Technology Department leadership leveraged best practices and lessons learned from other districts to enhance the experience of all major stakeholders.

Some of the lessons that the Technology Department leveraged include:

- ensuring technical competency among teachers as well as students;
- assessing bandwidth needs in today’s technology-rich environment;
- setting expectations with administrators and instilling an appreciation for the value of digital learning;
- communicating both internally and externally to fully explain the intent behind the initiative as well as expectations for students; and
- developing a well-conceived implementation plan with limited time and staff resources.

COMMENDATION

An effective 1:1 device initiative in Norwalk Public Schools provides invaluable instructional support for students.
CHAPTER 7:

EDUCATIONAL OPERATING EFFICIENCIES
7.0 EDUCATIONAL OPERATING EFFICIENCY

As part of the Efficiency Study of Norwalk Public Schools (NPS), Evergreen was charged with reviewing the educational operating efficiency of the organization. Areas related to the content of the student education curriculum programs, including special education programs, are excluded from the scope of this project; however, the financial and operational efficiency of these programs are within the scope.

The cost of salaries and benefits makes up almost 80 percent of the NPS operating budget and is therefore its primary cost driver. This chapter focuses on the overall management and staffing components and the budgetary decision-making processes used to control spending and maximize efficiency in the delivery of educational programs to NPS students.

7.1 Staffing Allocations and Budgeting of Resources
7.2 Outsourcing and Contract Services
7.3 Maximizing Federal and State Funds

The chapter is not intended to summarize or restate findings and recommendations relating to the central office or operational functions reviewed in earlier chapters of this report, although reference to areas impacting educational efficiency may be discussed.

7.1 STAFFING ALLOCATIONS AND BUDGETING OF RESOURCES

A report of all NPS employees (filled positions regardless of the funding source) generated on December 22, 2021, showed a total count of 2,038 full- and part-time employees of whom 1,751 were assigned to one of the 21 campus/school units/locations.

The count should not be confused with the total number of full-time equivalent (FTE) employees. A full-time employee is defined as .8 FTE or higher, for example, a secretary that is scheduled to work 32 hours in a week when other secretaries normally are scheduled to work 40 hours each week they would be considered a full-time employee for benefits leave and other purposes, but they would be counted as a .8 FTR (32 hours/40 hours). The State bases its FTE counts on the sum of the staff members FTE status. For staff members working less than a standard day or week, the staff members are counted as a fraction of full-time. For example, a teacher who works half-time in a school contributes 0.50 to the school’s FTE staff count.

Exhibit 7-1 shows the staffing count in terms of the number of employees, and the staff FTE counts broken down by location. As shown, the 2,038 employees equate to a total of 1,955.7 FTEs. Campus-based staff account for 88 percent of the District’s full-time staff, and 85 percent of total staff.

Obtaining comparative data from prior years is challenging. The Connecticut Department of Education tracks staffing information by year, but the categories used to account for staffing are arranged in a way that made comparisons with the actual December 2021 data difficult.
### Exhibit 7-1
**Employee and FTE Counts by Location**
**as of December 22, 2021**

<table>
<thead>
<tr>
<th>Location</th>
<th>Full-time Count</th>
<th>Full-time FTE</th>
<th>Part-time Count</th>
<th>Part-time FTE</th>
<th>Total Count</th>
<th>Total FTE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brien McMahon High School</td>
<td>214</td>
<td>212.2</td>
<td>32</td>
<td>27.3</td>
<td>246</td>
<td>239.5</td>
</tr>
<tr>
<td>Brookside Elementary School</td>
<td>57</td>
<td>56.4</td>
<td>17</td>
<td>13.8</td>
<td>74</td>
<td>70.2</td>
</tr>
<tr>
<td>Center For Global Studies</td>
<td>22</td>
<td>22.0</td>
<td>2</td>
<td>2.0</td>
<td>24</td>
<td>24.0</td>
</tr>
<tr>
<td>Columbus Elementary School</td>
<td>35</td>
<td>34.3</td>
<td>13</td>
<td>9.6</td>
<td>48</td>
<td>43.9</td>
</tr>
<tr>
<td>Cranbury Elementary School</td>
<td>49</td>
<td>48.7</td>
<td>12</td>
<td>9.5</td>
<td>61</td>
<td>58.3</td>
</tr>
<tr>
<td>Fox Run Elementary School</td>
<td>59</td>
<td>58.1</td>
<td>14</td>
<td>10.5</td>
<td>73</td>
<td>68.6</td>
</tr>
<tr>
<td>Jefferson Elementary School</td>
<td>56</td>
<td>55.5</td>
<td>12</td>
<td>9.4</td>
<td>68</td>
<td>64.9</td>
</tr>
<tr>
<td>Kendall Elementary School</td>
<td>57</td>
<td>56.7</td>
<td>20</td>
<td>15.9</td>
<td>77</td>
<td>72.6</td>
</tr>
<tr>
<td>Marvin Elementary School</td>
<td>47</td>
<td>46.2</td>
<td>17</td>
<td>13.3</td>
<td>64</td>
<td>59.5</td>
</tr>
<tr>
<td>Naramake Elementary School</td>
<td>45</td>
<td>44.5</td>
<td>15</td>
<td>10.4</td>
<td>60</td>
<td>54.9</td>
</tr>
<tr>
<td>Nathan Hale Middle School</td>
<td>72</td>
<td>71.7</td>
<td>9</td>
<td>6.8</td>
<td>81</td>
<td>78.5</td>
</tr>
<tr>
<td>Norwalk Early Childhood Ctr</td>
<td>28</td>
<td>28.0</td>
<td>6</td>
<td>4.9</td>
<td>34</td>
<td>32.9</td>
</tr>
<tr>
<td>Norwalk High School</td>
<td>195</td>
<td>193.6</td>
<td>30</td>
<td>24.9</td>
<td>225</td>
<td>218.4</td>
</tr>
<tr>
<td>P Tech</td>
<td>39</td>
<td>38.5</td>
<td></td>
<td></td>
<td>39</td>
<td>38.5</td>
</tr>
<tr>
<td>Ponus Ridge Middle School</td>
<td>90</td>
<td>88.4</td>
<td>16</td>
<td>14.4</td>
<td>106</td>
<td>102.8</td>
</tr>
<tr>
<td>Roton Middle School</td>
<td>71</td>
<td>70.1</td>
<td>15</td>
<td>12.4</td>
<td>86</td>
<td>82.5</td>
</tr>
<tr>
<td>Rowayton Elementary School</td>
<td>59</td>
<td>58.5</td>
<td>20</td>
<td>14.5</td>
<td>79</td>
<td>73.0</td>
</tr>
<tr>
<td>Silvermine Elementary School</td>
<td>52</td>
<td>50.6</td>
<td>22</td>
<td>17.5</td>
<td>74</td>
<td>68.1</td>
</tr>
<tr>
<td>Tracey Elementary School</td>
<td>60</td>
<td>60.0</td>
<td>19</td>
<td>15.8</td>
<td>79</td>
<td>75.8</td>
</tr>
<tr>
<td>West Rocks Middle School</td>
<td>83</td>
<td>82.5</td>
<td>7</td>
<td>6.3</td>
<td>90</td>
<td>88.8</td>
</tr>
<tr>
<td>Wolfpit Elementary School</td>
<td>53</td>
<td>53.0</td>
<td>10</td>
<td>7.6</td>
<td>63</td>
<td>60.6</td>
</tr>
<tr>
<td><strong>Total Campus-Based</strong></td>
<td>1,443</td>
<td>1,429.5</td>
<td>308</td>
<td>246.8</td>
<td>1,751</td>
<td>1,676.3</td>
</tr>
<tr>
<td><strong>Percent of Total Staff</strong></td>
<td>88.7%</td>
<td>88.6%</td>
<td>74.9%</td>
<td>72.0%</td>
<td>85.9%</td>
<td>85.7%</td>
</tr>
</tbody>
</table>

| Adult Basic Education           | 1               | 1             |                 |               |             |           |
| Curriculum & Instruction        | 23              | 23.0          | 4               | 3.2           | 27          | 26.2      |
| Equity, Excellence & Inclusion  | 5               | 5.0           |                 |               | 5           | 5.0       |
| Facilities                      | 10              | 10.0          | 10              | 9.7           | 20          | 19.7      |
| Finance Dept BOE                | 13              | 13.0          | 2               | 0.7           | 15          | 13.7      |
| Food Services                   | 28              | 28.0          | 26              | 26.0          | 54          | 54.0      |
| Human Resources                 | 9               | 9.0           | 1               | 0.7           | 10          | 9.7       |
| Information Technology          | 21              | 21.0          |                 |               | 21          | 21.0      |
| Operations                      | 5               | 5.0           | 5               | 4.8           | 10          | 9.8       |
| Pre School                      | 1               | 1.0           |                 |               | 1           | 1.0       |
| Reimbursable (High Band Pass Thru) | 13       | 13.0          |                 |               | 13          | 13.0      |
| Special Education & Pupil Personnel | 63    | 62.2          | 4               | 2.6           | 67          | 64.8      |
| Substitutes (Centrally Assigned) | 33         | 32.0          |                 |               | 33          | 32.0      |
| Summer School Program           | 3               | 3.0           |                 |               | 3           | 3.0       |
| Superintendent                  | 6               | 6.0           |                 |               | 6           | 6.0       |
| Transportation                  | 1               | 1.0           |                 |               | 1           | 1.0       |
| **Department/Program Total**    | 184             | 183.2         | 103             | 96.2          | 287         | 279.4     |
| **Percent Of Total Staff**      | 11.3%           | 11.4%         | 25.1%           | 28.0%         | 14.1%       | 14.3%     |
| **Grand Total**                 | 1,627           | 1,612.7       | 411             | 343.0         | 2038        | 1,955.7   |

Source: NPS Human Resources Department, January 2022.

**Exhibit 7-2** uses available state data and attempts to make comparisons to the actual staffing FTE information provided by NPS. Where possible to identify the subgroups making up the category, Evergreen inserted the estimated numbers into the state categories. Where there was a question, Evergreen identified the subgroups. For categories where a reasonable estimate was not possible, the category was left blank, and the change percentages reflect only the first three years in the chart. As noted, the actual numbers from December represent active employees and do not include vacancies.
## Exhibit 7-2
### Staffing Trends
2017-19 through 2021-22

<table>
<thead>
<tr>
<th>Staffing Category</th>
<th>2017-18</th>
<th>2018-19</th>
<th>2019-20</th>
<th>As of 12/22/21</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>General Education</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Teachers and Instructors</td>
<td>716</td>
<td>753</td>
<td>763</td>
<td>794.4</td>
<td>10.95%</td>
</tr>
<tr>
<td>Paraprofessional Instructional Assistants</td>
<td>129</td>
<td>273</td>
<td>260</td>
<td>N/A</td>
<td>100.90%</td>
</tr>
<tr>
<td><strong>Special Education</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Teachers and Instructors</td>
<td>91</td>
<td>107</td>
<td>108</td>
<td>123</td>
<td>35.16%</td>
</tr>
<tr>
<td>Paraprofessional Instructional Assistants</td>
<td>139</td>
<td>164</td>
<td>182</td>
<td>182.3</td>
<td>31.15%</td>
</tr>
<tr>
<td><strong>Administrators, Coordinators and Department Chairs</strong></td>
<td></td>
<td></td>
<td></td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>District Central Office</td>
<td>12</td>
<td>16</td>
<td>19</td>
<td>20</td>
<td>66.67%</td>
</tr>
<tr>
<td>School Level</td>
<td>44</td>
<td>45</td>
<td>58</td>
<td>53</td>
<td>20.45%</td>
</tr>
<tr>
<td><strong>Library/Media</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Specialists (Certified)</td>
<td>3</td>
<td>6</td>
<td>8</td>
<td>9</td>
<td>200.00%</td>
</tr>
<tr>
<td>Support Staff</td>
<td>13</td>
<td>11</td>
<td>10</td>
<td>5.7</td>
<td>-56.15%</td>
</tr>
<tr>
<td>Instructional Specialists Who Support Teachers</td>
<td>23</td>
<td>24</td>
<td>47</td>
<td>N/A</td>
<td>105.70%</td>
</tr>
<tr>
<td>Counselors, Social Workers and School Psychologists</td>
<td>65</td>
<td>66</td>
<td>72</td>
<td>82</td>
<td>26.15%</td>
</tr>
<tr>
<td>School Nurses</td>
<td>21</td>
<td>24</td>
<td>26</td>
<td>23</td>
<td>9.52%</td>
</tr>
<tr>
<td>Other Staff Providing Non-Instructional Services/Support</td>
<td>506</td>
<td>461</td>
<td>434</td>
<td>N/A</td>
<td>-14.30%</td>
</tr>
<tr>
<td><strong>Total Staff</strong></td>
<td>1,761</td>
<td>1,949</td>
<td>1,987</td>
<td>1955.7</td>
<td>11.05%</td>
</tr>
<tr>
<td><strong>Student Subgroups</strong></td>
<td></td>
<td></td>
<td></td>
<td>October 1, 2021</td>
<td>%Change</td>
</tr>
<tr>
<td>English Learners</td>
<td>1,782</td>
<td>1,801</td>
<td>2,047</td>
<td>2,149*</td>
<td>14.90%</td>
</tr>
<tr>
<td>Eligible for Free or Reduced-Price Meals</td>
<td>5,963</td>
<td>6,783</td>
<td>7,191</td>
<td>7,687*</td>
<td>20.60%</td>
</tr>
<tr>
<td>Students with Disabilities</td>
<td>1,653</td>
<td>1,671</td>
<td>1,720</td>
<td>1,789*</td>
<td>-4.10%</td>
</tr>
<tr>
<td><strong>Total Student Enrollment</strong></td>
<td>11,573</td>
<td>11,501</td>
<td>11,716</td>
<td>11,410**</td>
<td>0.05%</td>
</tr>
<tr>
<td><strong>Staffing Ratios</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Student to Total Staff Ratio</td>
<td>6.6</td>
<td>5.9</td>
<td>5.9</td>
<td>5.9</td>
<td></td>
</tr>
<tr>
<td>Student to Teacher Ratio</td>
<td>14</td>
<td>13</td>
<td>13</td>
<td>13</td>
<td></td>
</tr>
<tr>
<td>Students with Disabilities to Special Ed Teacher Ratio</td>
<td>18</td>
<td>16</td>
<td>16</td>
<td>15</td>
<td></td>
</tr>
<tr>
<td>Regular Education Student to Teacher Ratio</td>
<td>14</td>
<td>13</td>
<td>13</td>
<td>12</td>
<td></td>
</tr>
<tr>
<td>Total Student to Central Office Administrators</td>
<td>964</td>
<td>719</td>
<td>617</td>
<td>579</td>
<td></td>
</tr>
<tr>
<td>Total Student to Campus Administrators</td>
<td>263</td>
<td>256</td>
<td>202</td>
<td>218</td>
<td></td>
</tr>
</tbody>
</table>


N/A – Unable to Identify the Staff dedicated to this category, therefore the Percent of change reflects the prior three years.

*Data were not yet available from the state; Evergreen calculated the numbers based on the average annual increase during the prior three years.

**Provided by NPS but numbers are not final.

The ratios shown at the bottom of the chart are a measure of efficiency. The higher the ratios, the more efficiently the District is operating. Over the time frame shown, NPS ratios are declining.

To determine the reasonableness of the analytics shown above, Evergreen also looked at peer comparison data compiled by the National Center for Education Statistics. As shown, the most recent national data are from the 2019-20 school year,
Exhibit 7-3 shows the Pupil to Teacher and Pupil to Total Staff ratios for NPS and the peer districts, and reflects a somewhat higher ratios than the ratios shown above, but are in line with the peer organizations.

Exhibit 7-3
Pupil to Employee Ratios
2019-20 School Year

<table>
<thead>
<tr>
<th>School District</th>
<th>Total Students</th>
<th>Total Staff</th>
<th>FTE Teachers</th>
<th>Pupil/Teacher Ratio</th>
<th>Pupil/Staff Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fairfield</td>
<td>9,624</td>
<td>1,712.3</td>
<td>848.1</td>
<td>11.35</td>
<td>5.6</td>
</tr>
<tr>
<td>Westport</td>
<td>5,312</td>
<td>919.8</td>
<td>473.2</td>
<td>11.23</td>
<td>5.8</td>
</tr>
<tr>
<td>Greenwich</td>
<td>9,015</td>
<td>1,477.0</td>
<td>747.5</td>
<td>12.06</td>
<td>6.1</td>
</tr>
<tr>
<td>Norwalk</td>
<td>11,642</td>
<td>1,878.2</td>
<td>882.6</td>
<td>13.19</td>
<td>6.2</td>
</tr>
<tr>
<td>White Plains, NY</td>
<td>7,155</td>
<td>1,146.1</td>
<td>619.1</td>
<td>11.56</td>
<td>6.2</td>
</tr>
<tr>
<td>Stamford</td>
<td>16,479</td>
<td>2,505.6</td>
<td>1,317.6</td>
<td>12.51</td>
<td>6.6</td>
</tr>
<tr>
<td>Danbury</td>
<td>11,903</td>
<td>1,723.8</td>
<td>827.3</td>
<td>14.39</td>
<td>6.9</td>
</tr>
<tr>
<td>New Rochelle, NY</td>
<td>10,553</td>
<td>1,437.1</td>
<td>700.1</td>
<td>15.07</td>
<td>7.3</td>
</tr>
<tr>
<td>Average</td>
<td>10,210</td>
<td>1,600.0</td>
<td>801.9</td>
<td>12.7</td>
<td>6.3</td>
</tr>
</tbody>
</table>


Exhibit 7-4 examines the central and campus-based administrators and shows NPS has lower ratios than the peer averages. NPS has the lowest campus-based pupil to administrator ratios.

Exhibit 7-4
Central Administrators and School Administrators
2019-20 School Year

<table>
<thead>
<tr>
<th>School District</th>
<th>Total Students</th>
<th>Total Staff</th>
<th>Central Administrators</th>
<th>Pupil/Total Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Count</td>
<td>% of Total</td>
<td>Count</td>
<td>% of Total</td>
</tr>
<tr>
<td>Westport</td>
<td>5,312</td>
<td>24</td>
<td>2.6%</td>
<td>24</td>
</tr>
<tr>
<td>Fairfield</td>
<td>9,624</td>
<td>30</td>
<td>1.7%</td>
<td>326</td>
</tr>
<tr>
<td>Stamford</td>
<td>16,479</td>
<td>47</td>
<td>1.9%</td>
<td>352</td>
</tr>
<tr>
<td>Norwalk</td>
<td>11,642</td>
<td>23</td>
<td>1.2%</td>
<td>500</td>
</tr>
<tr>
<td>Greenwich</td>
<td>9,015</td>
<td>18</td>
<td>1.2%</td>
<td>509</td>
</tr>
<tr>
<td>Danbury</td>
<td>11,903</td>
<td>19</td>
<td>1.2%</td>
<td>614</td>
</tr>
<tr>
<td>White Plains, NY</td>
<td>7,155</td>
<td>5</td>
<td>0.4%</td>
<td>1,431</td>
</tr>
<tr>
<td>New Rochelle, NY</td>
<td>10,553</td>
<td>6</td>
<td>0.4%</td>
<td>1,810</td>
</tr>
<tr>
<td>Average</td>
<td>10,210</td>
<td>21</td>
<td>1.3%</td>
<td>721</td>
</tr>
</tbody>
</table>


Exhibit 7-5 looks at administrative support ratios, a category that is not discussed above. These data were also not available from two of the peers. The campus-based ratios for support staff are found to be in the higher range among its peers, while the ratio of central administrative support is slightly lower than the peer average.
**Exhibit 7-5**

**Administrative Support Staff**

**2019-20 School Year**

<table>
<thead>
<tr>
<th>School District</th>
<th>Total Students</th>
<th>Total Staff</th>
<th>Admin Support Staff</th>
<th>School Admin Support Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Count% of Total</td>
<td>Pupil/Emp Ratio</td>
<td>Count% of Total</td>
<td>Pupil/Emp Ratio</td>
</tr>
<tr>
<td>Fairfield</td>
<td>9,624 1,712.3 30 1.8% 321 62 3.6% 155</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Greenwich</td>
<td>9,015 1,477.0 33 2.2% 277 52 3.5% 173</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Westport</td>
<td>5,312 919.8 16 1.7% 332 26 2.8% 204</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Norwalk</td>
<td>11,642 1,878 44 2.4% 264 45 2.4% 260</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Danbury</td>
<td>11,903 1,666.6 31 1.9% 379 42 2.5% 281</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Stamford</td>
<td>16,479 2,505.6 29 1.2% 568 48 1.9% 343</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>New Rochelle, NY</td>
<td>10,533 1,437.1 140 9.7% 75 0 0.0% N/A</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>White Plains, NY</td>
<td>7,155 1,146.1 88 7.7% 81 0 0.0% N/A</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average</td>
<td>10,208 1,593 51 3.6% 287 34 2.1% 236</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>


**FINDING**

The number of NPS staff and staffing trends are convoluted by various reporting requirements, which has led to a sense that the District is not being transparent in the way it is reporting and characterizing staffing numbers and associated budgets.

Budget documents from prior years contain a staffing allocation by campus, but the positions shown are only those positions that are paid with local funds. The number of staff included in the City’s financial reports include only the staff paid from local funds. Staff paid from federal or state grants or outside foundations are not included.

As shown in **Exhibit 7-6**, the numbers being reported by the City are significantly lower than those shown in any of the sources above, yet City employees who are paid with grant funds are included in the report. The City Comptroller pays all salaries for all NPS staff, regardless of the source of funds, and therefore the numbers are misleading.

**Exhibit 7-6**

**Full Time Equivalent Employee Trends**

**2012 through 2021 Fiscal Years**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>NPS Employees</strong></td>
<td>1,310</td>
<td>1,236</td>
<td>1,259</td>
<td>1,163</td>
<td>1,191</td>
<td>1,166</td>
<td>1,209</td>
<td>1,228</td>
<td>1,228</td>
<td>1,409</td>
<td>7.6%</td>
</tr>
<tr>
<td><strong>City Employees</strong></td>
<td>648</td>
<td>634</td>
<td>638</td>
<td>636</td>
<td>639</td>
<td>643</td>
<td>645</td>
<td>646</td>
<td>631</td>
<td>627</td>
<td>-3.2%</td>
</tr>
<tr>
<td><strong>Total Employees</strong></td>
<td>1,958</td>
<td>1,870</td>
<td>1,897</td>
<td>1,799</td>
<td>1,830</td>
<td>1,809</td>
<td>1,854</td>
<td>1,874</td>
<td>1,859</td>
<td>2,036</td>
<td>4.0%</td>
</tr>
</tbody>
</table>

Source: 2021 Comprehensive Annual Financial Report, Table 17, Budget Full-Time Employees – Unaudited.

Compounding the problem is the State reporting methodology shown above. Clearly the State has no interest in splitting staff by the funding source and in the interest of making consistent comparisons, the FTE count is used rather than a count of how many people are employed—
whether part-time or full-time. Consequently, when an individual takes the initiative to pull state data and attempts to make comparison to locally available data, the results are often faulty.

**Exhibit 7-7** provides an excerpt from the March 16, 2021, presentation entitled *FY 2021-22 BET (Board of Estimating and Taxation) Meeting BOE Operating Budget Review*, which illustrates the frustration by school administrators regarding assumptions made by the City regarding staffing increases.

**Exhibit 7-7**
Staffing Analysis Discussion

Stamford Public Schools (CT) presents the combined staffing levels, including those funded locally and those funded by grants in a single, easy to follow summary document ([Exhibit 7-8](#)).
# Exhibit 7-8

## Stamford Public Schools 2022-23 Staffing Proposal

### 2022-23 Budget of the Stamford Public Schools

<table>
<thead>
<tr>
<th>Number</th>
<th>Object</th>
<th>2022-23 Positions</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>101</td>
<td>Teachers</td>
<td>1,259.1 (8.1)</td>
<td></td>
</tr>
<tr>
<td>102</td>
<td>Administrative</td>
<td>68.7</td>
<td>72.7</td>
</tr>
<tr>
<td>103</td>
<td>Teacher Support</td>
<td>130.0 (2.0)</td>
<td>111.5</td>
</tr>
<tr>
<td>113</td>
<td>Admin - Non-Certified</td>
<td>9.0</td>
<td>115.0</td>
</tr>
<tr>
<td>114</td>
<td>Clerical</td>
<td>81.7</td>
<td>82.7</td>
</tr>
<tr>
<td>115</td>
<td>Paraeducators</td>
<td>346.0 (1.0)</td>
<td>356.0</td>
</tr>
<tr>
<td>116</td>
<td>Custodial/Mechanics</td>
<td>102.0</td>
<td>151.0</td>
</tr>
<tr>
<td>117</td>
<td>Other</td>
<td>37.0 (2.0)</td>
<td>66.0</td>
</tr>
</tbody>
</table>

| Total Operating Budget | 2,017.5 (4.5) | 154.7 | 12.4 |

<table>
<thead>
<tr>
<th>Number</th>
<th>Object</th>
<th>2022-23 Positions</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>101</td>
<td>Teachers</td>
<td>202.3 (4.0)</td>
<td></td>
</tr>
<tr>
<td>102</td>
<td>Administrative</td>
<td>10.3</td>
<td>10.3</td>
</tr>
<tr>
<td>103</td>
<td>Teacher Support</td>
<td>4.0</td>
<td>4.0</td>
</tr>
<tr>
<td>113</td>
<td>Admin - Non-Certified</td>
<td>1.0</td>
<td>1.0</td>
</tr>
<tr>
<td>114</td>
<td>Clerical</td>
<td>4.4</td>
<td>4.4</td>
</tr>
<tr>
<td>115</td>
<td>Paraeducators</td>
<td>01.0 (2.0)</td>
<td>84.0</td>
</tr>
<tr>
<td>116</td>
<td>Custodians</td>
<td>0.0</td>
<td>0.0</td>
</tr>
<tr>
<td>117</td>
<td>Other</td>
<td>40.0 (2.0)</td>
<td>16.0</td>
</tr>
</tbody>
</table>

| Total Grants Budget | 323.0 (3.0) | 0.0 | 24.0 |

| Total System Budget | 2,370.5 (2.5) | 0.0 | 51.7 |

By clearly outlining the total number of positions included in the operating budget, regardless of the source, Stamford is providing decision-makers the full picture of the challenges they are facing. They are showing how they are leveraging dollars from other sources and thereby strengthening the argument for additional local dollars to fund the total staffing needs of Stamford Public Schools.

RECOMMENDATION

Recommendation 7-1:

Consistently report total staffing numbers, including staff paid from all sources.

Adding information regarding the number of positions paid with local funds, versus federal or state funds, can help clarify the budget discussions, without misleading the public regarding the actual numbers. Stamford Public Schools can be used as an example for implementation of this recommendation.

FISCAL IMPACT

This recommendation can be implemented with existing resources.

FINDING

NPS published and distributed a comprehensive Site Based Budget (SSB): Operating Budget Information packet to campus-level administrators providing guidelines for implementing the 2021-22 budget.

In April 2021, following the preliminary adoption of the budget for 2021-22, Principals were sent a packet of information regarding the spending amounts approved in the preliminary budget and instructions regarding the next steps in the process.

The PowerPoint began with a comparison of the prior year per pupil budgets versus the preliminarily approved 2021-22 budget as shown in Exhibit 7-9. The next slide then calculated the budget attributed to each campus based on the projected enrollment for the following year.
### Exhibit 7-9
Per Pupil Spending Comparisons by School Level

#### 2021-22 Per Pupil Spending By Level

<table>
<thead>
<tr>
<th>Level</th>
<th>2020-21 Approved Budget</th>
<th>2021-22 BOE Preliminary Approved Budget**</th>
<th>Change vs. PY Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Enrollment</td>
<td>Per pupil</td>
<td>Enrollment</td>
</tr>
<tr>
<td>District Wide Services*</td>
<td>3,989</td>
<td>$8,735</td>
<td>4,023</td>
</tr>
<tr>
<td>High Schools</td>
<td>2,741</td>
<td>$8,312</td>
<td>2,625</td>
</tr>
<tr>
<td>Middle Schools</td>
<td>4,975</td>
<td>$8,749</td>
<td>4,923</td>
</tr>
<tr>
<td>Elementary Schools</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NECC &amp; Brookside (Pre-K)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>11,705</td>
<td></td>
<td>11,571</td>
</tr>
</tbody>
</table>

*District Wide services expenditures include health insurance, reserve teachers, transportation, etc.
**Includes holding shift for MS sports only. Does not yet include magnet fund allocations.

#### 2021-22 Per Pupil Spending By Elementary School

<table>
<thead>
<tr>
<th>School</th>
<th>Base per pupil</th>
<th>Enrollment</th>
<th>Base SBB $</th>
<th>Magnet Funding</th>
<th>Total SBB $</th>
<th>Total Per Pupil</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brookside - 22</td>
<td>$8,539</td>
<td>426</td>
<td>$3,637,783</td>
<td>-</td>
<td>$3,637,783</td>
<td>$8,539</td>
</tr>
<tr>
<td>Columbus - 24</td>
<td>$8,539</td>
<td>261</td>
<td>$2,228,783</td>
<td>-</td>
<td>$2,228,783</td>
<td>$8,539</td>
</tr>
<tr>
<td>Cranbury - 25</td>
<td>$8,539</td>
<td>448</td>
<td>$3,825,650</td>
<td>-</td>
<td>$3,825,650</td>
<td>$8,539</td>
</tr>
<tr>
<td>Fox Run - 28</td>
<td>$8,539</td>
<td>387</td>
<td>$3,304,747</td>
<td>-</td>
<td>$3,304,747</td>
<td>$8,539</td>
</tr>
<tr>
<td>Jefferson - 32</td>
<td>$8,539</td>
<td>422</td>
<td>$3,603,626</td>
<td>-</td>
<td>$3,603,626</td>
<td>$8,539</td>
</tr>
<tr>
<td>Kendall - 34</td>
<td>$8,539</td>
<td>446</td>
<td>$3,808,571</td>
<td>-</td>
<td>$3,808,571</td>
<td>$8,539</td>
</tr>
<tr>
<td>Marvin - 37</td>
<td>$8,539</td>
<td>421</td>
<td>$3,595,086</td>
<td>-</td>
<td>$3,595,086</td>
<td>$8,539</td>
</tr>
<tr>
<td>Naramake - 39</td>
<td>$8,539</td>
<td>346</td>
<td>$2,954,632</td>
<td>-</td>
<td>$2,954,632</td>
<td>$8,539</td>
</tr>
<tr>
<td>Rowayton - 43</td>
<td>$8,539</td>
<td>505</td>
<td>$4,312,396</td>
<td>-</td>
<td>$4,312,396</td>
<td>$8,539</td>
</tr>
<tr>
<td>Silvermine - 44</td>
<td>$8,539</td>
<td>467</td>
<td>$3,987,899</td>
<td>-</td>
<td>$3,987,899</td>
<td>$8,539</td>
</tr>
<tr>
<td>Tracey - 45</td>
<td>$8,539</td>
<td>461</td>
<td>$3,936,662</td>
<td>-</td>
<td>$3,936,662</td>
<td>$8,539</td>
</tr>
<tr>
<td>Wolfpit - 49</td>
<td>$8,539</td>
<td>333</td>
<td>$2,843,619</td>
<td>-</td>
<td>$2,843,619</td>
<td>$8,539</td>
</tr>
<tr>
<td><strong>Elementary School Total</strong></td>
<td>$8,539</td>
<td>4,923</td>
<td>$42,039,454</td>
<td>-</td>
<td>$42,039,454</td>
<td>$8,539</td>
</tr>
</tbody>
</table>

Source: NPS Finance Department, December 2021.
Based on this preliminary budget information for their schools, Principals were given the following forms and tools they would need to allocate the budgeted funds.

The presentation alerts Principals to the fact that the budgets are based on projected enrollment and may require adjustments after July 1 to ensure that actual enrollment does not exceed class size limits.

The tools and forms provided to the Principals included the following:

- Summary by object code for School Governance Council (SGC) review
- School-Based Budget Entry Request Sheet by line item (org/object/project), including a reference to the 20-21 budget as well as YTD actuals by line item as a reference
- Personnel Roster – for both local (fund 11) and grant (fund 12) and should include all employees in your building regardless of the budget it is funded from (i.e., SPED, ELL staff and other interventionists)
- Projected enrollment and class sections (Elementary level)
- Summary of budgeted average salaries by org and object code
- SBB Funding Allocation Spreadsheet by school
- Average Salaries by Position Classification
- Average Benefits by Union

The PowerPoint outlined the mandatory requirement that must be followed, such as maximum class sizes, and listed the items over which Principals had discretion—such as supplemental staffing.

In addition, Principals were required to link their budget allocation to NPS goals and plans as shown in the following excerpts:

- New initiatives should support School Improvement Plans and Professional Learning Plans (PLPs)
  - These strategic plans are already approved by your SGC
- Scheduling for:
  - High School should be aligned with the Program of Study
  - Middle School: Individual to each school
  - Required house model
  - Elementary
At the end of the PowerPoint, a recap was provided showing the changes from the prior year.

**COMMENDATION**

The campus-based budget allocation process is documented and well-organized, and requires Principals to align the staffing and budget allocations to the District’s overall goals and objectives.

**FINDING**

While Principals are heavily involved in the allocation of the approved budget, Principal involvement in budget creation is limited.

---

### Exhibit 7-10

**Budget Calendar**

**2022-23**

<table>
<thead>
<tr>
<th>Event</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personnel rosters sent to Schools and Central Office Departments for verification</td>
<td>w/o 9/6/21</td>
</tr>
<tr>
<td>Budget request packages distributed to Central Office Departments</td>
<td>w/o 9/13/21</td>
</tr>
<tr>
<td>Central Office Departments return budget requests</td>
<td>10/13/21 or before</td>
</tr>
<tr>
<td>Finance/Central Office review of budget requests</td>
<td>10/4-10/29/21</td>
</tr>
<tr>
<td>Board of Education workshop on budget</td>
<td>12/7/21</td>
</tr>
<tr>
<td>Review budget recommendation at regular Finance Committee meeting</td>
<td>12/8/21</td>
</tr>
<tr>
<td>Superintendent’s Recommended 2022-23 Operating Budget approved by the BOE</td>
<td>12/21/21</td>
</tr>
<tr>
<td><strong>Student-Based Budget Packages sent to school principals for development of student-based, school budgets</strong></td>
<td>w/o 2/7/22</td>
</tr>
<tr>
<td>Operating Budget Recommendation to BET by City CFO</td>
<td>2/7/22</td>
</tr>
<tr>
<td>City CFO to present Operating Budget Recommendation to Common Council</td>
<td>2/8/22</td>
</tr>
<tr>
<td>BET Public Hearing on Operating Budget</td>
<td>March TBD</td>
</tr>
<tr>
<td><strong>Principals receive input from School Governance Councils and return budget request to Central Office</strong></td>
<td>3/28/22</td>
</tr>
<tr>
<td>Board of Estimate and Taxation adopts tentative budget and forwards to Common Council</td>
<td>3/29/22</td>
</tr>
<tr>
<td><strong>Board of Education reviews School-based budgets</strong></td>
<td>TBD – May</td>
</tr>
<tr>
<td>Board of Estimate and Taxation adopts final operating budget</td>
<td>5/2/22</td>
</tr>
<tr>
<td>Superintendent and CFO reconcile budget to final BET approved budget – revise per student allocations if necessary</td>
<td>TBD – May</td>
</tr>
<tr>
<td><strong>School principals revise Student Based Budget, to meet revised allocations, if necessary</strong></td>
<td>TBD – May</td>
</tr>
<tr>
<td>Board of Education adopts the final FY 2022-23 budget</td>
<td>5/24/22</td>
</tr>
</tbody>
</table>

*Source: Norwalk Public Schools, Budget Director, 2021.*

---

As shown in the following excerpt from the budget calendar for FY 2022-23 (Exhibit 7-10), Principals are not involved until a proposed budget has been set and they are asked to develop a student-based budget based on the approved amounts.
During a focus group with representative Principals from each school level, Principals indicated that they work with their SGC to develop their plans and goals for the coming year. When the budget is approved, it becomes a “math problem” because the Principal must then figure out how to use the money in a way that will help them achieve the goals.

Since most of the employees are unionized, the salaries and benefits are fixed, and Principals stated that the contracts prevail. They work with their SGC to review the proposals and finalize how the money will be used, but have little say in how many support staff will be allocated to their schools, in particular, since some staffing is centrally budgeted (such as Special Education Teachers, Speech Pathologists, Social Workers and Psychologists).

In terms of capital needs, Principals said they are not involved. General repairs and maintenance are budgeted centrally. If they need to replace equipment or purchase a new piece of equipment, Principals stated that the operating budget is their only source of funds. If there is money in the budget to make the purchase, they make the purchase. If there are special needs that arise during the year that cannot be handled with their operating funds, a request for additional funds is sent up the chain of command for approval.

**RECOMMENDATION**

**Recommendation 7-2:**

Establish a process whereby Principals have additional input into the budget creation process, including the identification of capital budget needs within their schools.

Requests for additional or different types of staff should be accompanied with a justification. Although the Capital Budget is prepared centrally, having Principal input on what they believe is needed on a campus-by-campus basis, would provide leadership an indication of global needs that could be combined and put forth as a capital need for the District.

**FISCAL IMPACT**

This recommendation can be implemented with existing resources.

**FINDING**

Campus-level administrators and instructional support personnel are equitably allocated to campuses based on enrollment and need.

Although the staffing comparisons shown in Exhibit 7-2 previously identify only 19 filled principal positions and 14 filled assistant principal positions in December 2021, schools/academies are all allocated one principal/director position. Assistant principals at the high school level are allocated based on enrollment and need. One assistant principal is allocated to each middle school, and only Kendall Elementary is assigned an assistant principal based on need.
**Exhibit 7-11** provides a breakdown of professional instructional support positions by campus that were filled in December 2021. The Center for Global Studies and PTech are eliminated from this discussion due to the nature of the programs.

### Exhibit 7-11
**Professional Instructional Support Positions by Campus**
**as of December 2021**

<table>
<thead>
<tr>
<th>School</th>
<th>Nurses</th>
<th>Psychologist</th>
<th>School Counselor</th>
<th>Social Worker</th>
<th>Speech Therapist</th>
</tr>
</thead>
<tbody>
<tr>
<td>Brien McMahon High School</td>
<td>2.0</td>
<td>3.0</td>
<td>10.0</td>
<td>3.0</td>
<td>1.0</td>
</tr>
<tr>
<td>Norwalk High School</td>
<td>2.0</td>
<td>1.0</td>
<td>8.0</td>
<td>3.0</td>
<td>1.0</td>
</tr>
<tr>
<td>Nathan Hale Middle School</td>
<td>1</td>
<td></td>
<td>3</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Ponus Ridge Middle School</td>
<td>1</td>
<td>1</td>
<td>3</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Roton Middle School</td>
<td>1</td>
<td>1</td>
<td>3</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>West Rocks Middle School</td>
<td>1</td>
<td>1</td>
<td>3</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Brookside Elementary School</td>
<td>1</td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Columbus Elementary School</td>
<td>1</td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Cranbury Elementary School</td>
<td>1</td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Fox Run Elementary School</td>
<td>1</td>
<td>1</td>
<td></td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Jefferson Elementary School</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Kendall Elementary School</td>
<td>1</td>
<td>2</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Marvin Elementary School</td>
<td>1</td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Naramake Elementary School</td>
<td>1</td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Norwalk Early Childhood Ctr</td>
<td>1</td>
<td>2</td>
<td></td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>Rowayton Elementary School</td>
<td>1</td>
<td>1</td>
<td></td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Silvermine Elementary School</td>
<td>1</td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Tracey Elementary School</td>
<td>1</td>
<td>2</td>
<td></td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Wolfpit Elementary School</td>
<td>1</td>
<td></td>
<td></td>
<td>1</td>
<td>1</td>
</tr>
</tbody>
</table>

Source: NPS Human Resources Department, January 2022.

As shown, the positions are fairly consistently applied by campus, with interviews determining that some additional support is provided to specific campuses based on need.

**COMMENDATION**

Campus-level staffing of administrators and professional support is consistently provided based on enrollment and need.

**FINDING**

An analysis of campus-based staffing does not indicate that NPS is efficiently allocating resources to meet student needs and/or strategic goals and objectives.

Article XX of the Norwalk Federation of Teachers Bargaining Agreement provides maximum student to teacher ratios of:

- Grades K,1 and 2: 22 students per class
- Grades 3,4 and 5: 24 students per class
- Grades 6 through 12: 28 students per class
These class size provisions do not apply to magnet schools. The agreement goes on to state that the Board intends to maintain a pupil-teacher ratio of 24.0 to 1 at elementary schools and 21.3 to 1 at secondary schools—exclusive of team teaching—during the length of this agreement.

Exhibit 7-12 provides the average student to teacher ratios maintained at each school level for the last six years. This ratio is based on the total number of regular education teachers divided by the total school enrollment for the year. Special education teachers are eliminated from the ratio, but the student population includes all student, since many students with special needs are taught in regular classrooms (least restrictive environment).

Exhibit 7-12
Student to Regular Education Teacher and Student to Regular Education Paraprofessional Ratios
2016-17 through 2021-22 School Years

<table>
<thead>
<tr>
<th>School Year</th>
<th>Teacher Ratios</th>
<th>Paraprofessional Ratios</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Elementary</td>
<td>Middle</td>
</tr>
<tr>
<td></td>
<td>School*</td>
<td>School</td>
</tr>
<tr>
<td>2016-17</td>
<td>19.0</td>
<td>18.5</td>
</tr>
<tr>
<td>2017-18</td>
<td>17.0</td>
<td>14.1</td>
</tr>
<tr>
<td>2018-19</td>
<td>15.4</td>
<td>13.9</td>
</tr>
<tr>
<td>2019-20</td>
<td>15.7</td>
<td>14.0</td>
</tr>
<tr>
<td>2020-21</td>
<td>14.6</td>
<td>13.5</td>
</tr>
<tr>
<td>2021-22</td>
<td>14.6</td>
<td>13.9</td>
</tr>
</tbody>
</table>

Source: Compiled by Evergreen based on data from the Connecticut Department of Education; 2021-22 teacher ratios compiled by Evergreen from December 2021 staffing data and October 1 student counts.

* Excludes Norwalk Early Childhood Center

** Excludes Center for Global Studies and P Tech

*** Calculated and provided by the Assistant Superintendent of Schools, February 2021.

Evergreen did not attempt to calculate the ratios for paraprofessionals for 2021-22 due to an inability to match state calculations for this category. A ratio for the elementary paraprofessional positions was provided to Evergreen in February 2022 that shows that efforts are being made to redirect some of those positions in the last year.

With few exceptions, elementary, middle and high school student to teacher ratios have steadily declined, and some, but not all of the decline may be in direct correlation to the steady rise in the number of multilingual and special needs students. For example, included in the regular education teacher category for 2021-22, are 48.2 Multi Language Learner Teachers.

The District also appears to be making greater use of paraprofessionals. In general education, experts suggest an elementary student to paraprofessional ratio of 75-1. At the secondary levels, regular education paraprofessionals are generally used for behavioral matters and academic enhancement or intervention. As shown, the elementary ratios had steadily declined until this last year. At the secondary level, 2018-19 and 2019-20 show a remarkable increase in the number of paraprofessionals resulting in a much lower ratio; however, in 2020-21, the ratios appear to have returned to a more normalized number.
In some districts where class sizes are at or near maximum levels, either established by the state or by local policy, paraprofessionals are added to a classroom to bring the overall student to classroom staff ratios to acceptable levels. These two charts show that at the elementary level, not only are class sizes declining in size, but the use of paraprofessionals exceeds the recommended number per student population. As stated above, NPS has seen a steady increase in students with special learning needs, which may account for some, but not all of the staffing decisions made at the elementary level in particular.

An examination of the educational aspects of the program is outside of Evergreen’s scope of service; however, it is important to note that staff and administrators indicated that they felt that educationally, more targeted support was needed for students with special needs as opposed to general support that is currently provided by general education paraprofessionals. Principals, for example, pointed to the need for additional mental health assistance, particularly in light of growing behavioral issues arising from the pandemic. Others pointed to the need for interventionists for reading, math, and other core subjects.

RECOMMENDATION

Recommendation 7-3:

Develop a staffing plan to establish educationally sound, but more efficient teacher and paraprofessional staffing guidelines, particularly at the elementary level.

Many districts use a staffing plan which is updated annually for this purpose.

The actual staffing plan should be based on sound educational practices and standards which may include the reallocation of some resources for the provision of more targeted support. Further, positions that are added using grant funds (such as Title I funds intended to enhance the educational process) should be excluded from the formulas where appropriate to ensure that the grant money is not supplanting basic education.

FISCAL IMPACT

The following is not intended to be prescriptive and only addresses staffing at the elementary level to provide an estimate of possible savings, although other staffing reallocations may be possible at all grade levels. By establishing a goal of maintaining an average student to regular education teacher ratio at the elementary level of 18 to 1 based on the 2016-17 ratios, and a student to paraprofessional level of 75 to 1 (taking into account the growing number of students with special needs) savings are estimated below.

The number of teachers shown in the chart below does not include teachers that are already focused on specific student needs, such as Multi Language Learner Teachers, Math Improvement Teachers and Reading and Writing Improvement Teachers. This recommendation is focused on regular education teaching positions.
Educational Operating Efficiency

Efficiency Study of Norwalk Public Schools

<table>
<thead>
<tr>
<th>Elementary Level Position</th>
<th>FTE Level *</th>
<th>Positions needed for ratio</th>
<th>Reduction</th>
<th>2021-22 Average Annual Salary</th>
<th>NPS Benefits of 30%</th>
<th>NPS Total Salary + Benefits</th>
<th>Savings</th>
<th>Savings less 75% Reinvestment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Paraprofessionals</td>
<td>2021-22</td>
<td>65 (75 to 1 Ratio)</td>
<td>45</td>
<td>$38,122</td>
<td>$11,437</td>
<td>$49,559</td>
<td>$2,230,137</td>
<td>$557,534</td>
</tr>
<tr>
<td>Teachers</td>
<td>2021-22</td>
<td>270</td>
<td>38</td>
<td>$94,102</td>
<td>$28,231 **</td>
<td>$122,333</td>
<td>$4,648,639</td>
<td>$1,162,160</td>
</tr>
</tbody>
</table>

Total Savings/ Net Savings

* Using the numbers provided by NPS for the current year.

These are estimated savings based on general assumptions at the elementary level, but additional savings at all levels may be possible in order to reallocate dollars to more focused positions.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Develop a Staffing Plan</td>
<td>$1,719,694</td>
<td>$1,719,694</td>
<td>$1,719,694</td>
<td>$1,719,694</td>
<td>$1,719,694</td>
</tr>
</tbody>
</table>

FINDING

Stipends, supplements and extra duty pay for certified staff as outlined in the bargaining agreements are convoluted and difficult to track and budget.

In the bargaining agreement with the Norwalk Federation of Teachers, Appendix A-5 Salary Schedules, contains 16 pages of detail on the amounts that certified staff will be paid for certain extra duties. With the exception of the specific amounts paid for sports and other extra-curricular activities, the remaining pages appear to be unorganized and vacillate between hourly annual and daily rates.

An example of a page from the agreement in Exhibit 7-13 shows an annualized stipend for a department chair, a salary adjustment for the Dean of Students position, and the hourly rate for a part-time teacher. In addition, this page also contains special provisions for how absences will be handled for department chairpersons. The structure of the document makes it very difficult to navigate, and presumably difficult to administer for campus and central office staff.
Exhibit 7-13
Excerpt from Appendix A-5 Salary Schedules

IX. Department Chairpersons* And Subject Area Leaders

High School
The stipend for certificated personnel employed as Department Chairpersons or Subject Area Leaders as follows:

<table>
<thead>
<tr>
<th></th>
<th>ANNUAL RATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>HIGH SCHOOL</td>
<td>2020-2021 2021-2022 2022-2023</td>
</tr>
<tr>
<td>Department Chairperson</td>
<td>$3,265   $3,298   $3,331</td>
</tr>
</tbody>
</table>

*Teachers who are Teachers-in-Charge, Teacher Coordinators, Team Leaders, Department Chairpersons or Deans of Students who are absent for forty-five (45) consecutive school days shall continue to receive their stipend. Beginning on the forty-sixth (46th) consecutive day of absence, said teachers will have their stipend deducted prorated on a per diem basis (1/200 of the stipend for each school day of absence.)

Middle School
The stipend for certificated personnel employed as Middle School Subject Area Leaders shall be .25 of the High School stipend.

<table>
<thead>
<tr>
<th></th>
<th>ANNUAL RATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>MIDDLE SCHOOL</td>
<td>2020-2021 2021-2022 2022-2023</td>
</tr>
<tr>
<td>Subject Area Leader</td>
<td>$816      $824     $832</td>
</tr>
<tr>
<td>Head Guidance Counselor</td>
<td>$3,265   $3,298   $3,331</td>
</tr>
</tbody>
</table>

X. Dean of Students*
The stipend for certificated personnel employed as Dean of Students shall be 10% of the affected teacher’s annual salary.

XI. Part-Time Teachers
The salary schedule for certificated personnel employed in part-time positions shall be as follows:

<table>
<thead>
<tr>
<th></th>
<th>HOURLY RATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>STEP</td>
<td>2020-2021 2021-2022 2022-2023</td>
</tr>
<tr>
<td>1</td>
<td>$47      $48      $48</td>
</tr>
<tr>
<td>2</td>
<td>$49      $50      $50</td>
</tr>
</tbody>
</table>

Source: Norwalk Federation of Teachers Agreement, September 1 through August 31, 2023.

To better understand the complexities of this process, Evergreen categorized the salary addendums as follows:

1. **Teacher Salary Plus Positions** – calculation of base pay for a position paid on the teacher salary schedule but not a classroom teacher (i.e., school counselor, dean of students, etc.)

2. **Annualized Extra Duty Pay** – an annualized amount paid for assuming a role of responsibility (i.e., team leader, department chair, coaching, etc.).
3. **Hourly Pay for Extra Duties** – a stipulated hourly amount paid for performing intermittent activities (i.e., curriculum development, professional development presenter, etc.)

The “stipends” paid when hiring a Counselor, Dean or other position described in the first category do not appear in the accounting records as a stipend, but rather appear as the base salary for those positions.

Categories 2 and 3 above are accounted for in the accounting object codes shown in **Exhibit 7-14**.

### Exhibit 7-14
**Extra Duty Related Object Codes**

<table>
<thead>
<tr>
<th>Object Code</th>
<th>Description</th>
<th>Definition</th>
<th>Evergreen Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>102</td>
<td>Professional Development</td>
<td>Extra wage payments associated with professional development</td>
<td>Category 3</td>
</tr>
<tr>
<td>133</td>
<td>Salaries-Workshops</td>
<td>Substitutes for, or hourly payments to, teachers involved in curricular development and in-service training/workshops as well as for school business</td>
<td>Category 3</td>
</tr>
<tr>
<td>134</td>
<td>Salaries-Extra Curricula</td>
<td>Expenditures for athletic coaches for all sports including varsity and junior varsity for fall, winter and spring semesters</td>
<td>Category 2</td>
</tr>
<tr>
<td>137</td>
<td>Certified Hourly</td>
<td>Expenditures for homebound instruction, the BOE's contribution for Adult Education, the Norwalk Alternative Education Opportunity program for expelled students, band instrument lessons at the elementary level, summer curriculum work, and after school activities at the middle schools</td>
<td>Category 3</td>
</tr>
<tr>
<td>138</td>
<td>Non-Certified Hourly</td>
<td>Non-certified outside testers to administer state testing in ELL. Compensation for work study students and extra work for non-certified staff.</td>
<td>Not included in NFT Agreement</td>
</tr>
<tr>
<td>139</td>
<td>Extra-Curricular Stipends</td>
<td>Stipends for activities such as class advisors, yearbook, band, national honor society, jazz ensemble, cheerleaders etc. Stipends are paid in accordance with the teachers' contract</td>
<td>Category 2</td>
</tr>
</tbody>
</table>

Source: NPS Finance Department, January 2022.

As shown in **Exhibit 7-15**, expenditures in this extra duty object codes are increasing.
## Exhibit 7-15
### Extra Duty Expenditures by Object Codes
FY 2019 through FY 2022 (through December 2021)

<table>
<thead>
<tr>
<th>Object</th>
<th>Account Description</th>
<th>2019 ACTUAL</th>
<th>2020 ACTUAL</th>
<th>2021 ACTUAL</th>
<th>Actuals 2022 thru Dec 2021</th>
<th>Change from 2019 to 2021</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>General Fund</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>102</td>
<td>Professional Development</td>
<td>$8,500</td>
<td>$101,239</td>
<td>$77,403</td>
<td>$2,890</td>
<td>810.6%</td>
</tr>
<tr>
<td>133</td>
<td>Salaries Workshops (Hrly Teacher Pmts)</td>
<td>$47,965</td>
<td>$47,740</td>
<td>$43,279</td>
<td>$6,577</td>
<td>-9.8%</td>
</tr>
<tr>
<td>134</td>
<td>Salaries Extracurricular (Athletic Coaches)</td>
<td>$238,958</td>
<td>$220,876</td>
<td>$164,088</td>
<td>$143,859</td>
<td>-31.3%</td>
</tr>
<tr>
<td>137</td>
<td>Certified Hourly</td>
<td>$658,503</td>
<td>$565,956</td>
<td>$639,327</td>
<td>$186,874</td>
<td>-2.9%</td>
</tr>
<tr>
<td>138</td>
<td>Non-Certified Hourly</td>
<td>$53,719</td>
<td>$49,193</td>
<td>$69,469</td>
<td>$45,765</td>
<td>29.3%</td>
</tr>
<tr>
<td>139</td>
<td>Stipends (Per NFT Contract)</td>
<td>$1,323,699</td>
<td>$1,005,546</td>
<td>$1,184,203</td>
<td>$562,366</td>
<td>-10.5%</td>
</tr>
<tr>
<td></td>
<td>General Fund</td>
<td>$2,331,345</td>
<td>$1,990,550</td>
<td>$2,177,770</td>
<td>$948,332</td>
<td>-6.6%</td>
</tr>
<tr>
<td></td>
<td>Grant Fund</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>102</td>
<td>Professional Development</td>
<td>$2,400</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>-100.0%</td>
</tr>
<tr>
<td>134</td>
<td>Salaries Extracurricular (Athletic Coaches)</td>
<td>$1,906</td>
<td>$5,050</td>
<td>$0</td>
<td>$0</td>
<td>-100.0%</td>
</tr>
<tr>
<td>137</td>
<td>Certified Hourly</td>
<td>$947,242</td>
<td>$660,627</td>
<td>$1,492,100</td>
<td>$1,482,285</td>
<td>57.5%</td>
</tr>
<tr>
<td>138</td>
<td>Non-Certified Hourly</td>
<td>$239,561</td>
<td>$247,893</td>
<td>$343,715</td>
<td>$603,391</td>
<td>43.5%</td>
</tr>
<tr>
<td>139</td>
<td>Stipends (Per NFT Contract)</td>
<td>$281,062</td>
<td>$165,931</td>
<td>$115,949</td>
<td>$49,768</td>
<td>-58.7%</td>
</tr>
<tr>
<td>Grant Fund</td>
<td></td>
<td>$1,472,172</td>
<td>$1,079,501</td>
<td>$1,951,764</td>
<td>$2,135,443</td>
<td>32.6%</td>
</tr>
<tr>
<td>Grand Total</td>
<td>$3,803,516</td>
<td>$3,070,051</td>
<td>$4,129,534</td>
<td>$3,083,776</td>
<td>8.6%</td>
<td></td>
</tr>
</tbody>
</table>

Source: NPS Finance Department Budget to Actual Expenditures, February 2022.

It is important to note that summer school represents a significant amount of the total costs, and the cost for summer school is included in the six month actual numbers for FY 2022, which included costs for stipends beginning in July 2021. Exhibit 7-16 breaks down the expenditure to show the impact of summer school and the grant funds used to supplement that program during COVID.

## Exhibit 7-16
### Summer School vs. Other Extra Duty Expenditures
FY 2019 through FY 2022 (through December 2021)

<table>
<thead>
<tr>
<th>Category</th>
<th>2019 ACTUAL</th>
<th>2020 ACTUAL</th>
<th>2021 ACTUAL</th>
<th>Actuals 2022 thru Dec 2021</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>General Fund (Fund 11)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other</td>
<td>$2,331,345</td>
<td>$1,990,550</td>
<td>$2,004,741</td>
<td>$979,022</td>
</tr>
<tr>
<td>Summer</td>
<td>$1,299,785</td>
<td>$829,682</td>
<td>$1,268,640</td>
<td>$144,719</td>
</tr>
<tr>
<td><strong>General Fund</strong></td>
<td>$2,331,345</td>
<td>$1,990,550</td>
<td>$2,177,770</td>
<td>$948,332</td>
</tr>
</tbody>
</table>

| **Grant Fund (Fund 12)** | | | | |
| Other               | $1,472,172  | $1,079,501  | $1,951,764  | $2,135,443                  |
| Summer              | $172,387    | $249,819    | $683,124    | $1,990,724                  |
| **Grant Fund**      | $1,472,172  | $1,079,501  | $1,951,764  | $2,135,443                  |
| **Grand Total**     | $3,803,516  | $3,070,051  | $4,129,534  | $3,083,776                  |

Source: NPS Finance Department Budget to Actual Expenditures, February 2022.
In the case of the annualized rates paid for extra duties and responsibilities, NPS has a process for posting the position so that employees can apply for and receive those stipends based on merit. There is, however, no agreement signed or tracking mechanism in place to define the work that the individual is expected to perform and ensure that the employee performed the assigned duties before the stipend is paid.

The Certified Hourly expenditures are the highest of all of the categories and appear to be the cost driver for overall increases. While Evergreen did not perform a salary and stipend study as part of this review, most of the hourly rates appear to be reasonable. As shown in Exhibit 7-17, however, the hourly rates appear to be high, particularly in comparison to an Assistant Superintendent’s hourly salary rate of approximately $104.00 an hour. The hourly rate shown for the CEU presenters exceeds the Superintendent’s hourly rate.

Exhibit 7-17
Excerpt from Appendix A-5 Salary Schedules

<table>
<thead>
<tr>
<th>XVIII. Professional Day Presenters</th>
</tr>
</thead>
<tbody>
<tr>
<td>The salary schedule for certificated personnel employed as presenters in professional day(s) program(s) shall be as follows:</td>
</tr>
<tr>
<td><strong>HOURLY RATE</strong></td>
</tr>
<tr>
<td>2020-2021</td>
</tr>
<tr>
<td>$86</td>
</tr>
</tbody>
</table>

The hourly rates set forth above shall be split or prorated in the event of multiple presenters, consistent with past practice.

<table>
<thead>
<tr>
<th>XIX. Continuing Education Unit Presenters (CEU)</th>
</tr>
</thead>
<tbody>
<tr>
<td>The salary schedule for certificated personnel employed in CEU programs who are presenters shall be paid as follows:</td>
</tr>
<tr>
<td><strong>HOURLY RATE</strong></td>
</tr>
<tr>
<td>2020-2021</td>
</tr>
<tr>
<td>$159</td>
</tr>
</tbody>
</table>

The hourly rates set forth above shall be split or prorated in the event of multiple presenters, consistent with past practice.

Source: Norwalk Federation of Teachers Agreement, September 1 through August 31, 2023.

The complexity of the stipend process and the associated accounting and control challenges, coupled with the rising costs, make this an area of opportunity for positive gage, in the District.

RECOMMENDATION

Recommendation 7-4:

During the next contract negotiation process, organize and simplify the extra duty pay categories and search for ways to immediately begin reducing total costs.
The increase of more than $2 million dollars between FY 2021 to FY 2022 is excessive and every effort should be made to immediately identify and control costing for non-essential extra duties. The campus-level budgets for the coming year should be changed to reflect the reductions and require principals to assess critical needs. Stipends should be used to fill only those needs that are critical to the educational programs. Modifying the contract to simplify the presentation and align the types of extra duties will also be beneficial. The categories used by Evergreen above could provide categories that NPS may be able to use in this process. The salary schedules for the non-certified hourly positions also need to be examined and simplified.

Attention should also be given to how time off in combination with the stipends are to be treated and efforts should be made to ensure that these stipend amounts are equitable. When multiple stipends are given to an individual employee, an examination of the workload, the number of extra duty hours spent and the overall reasonableness of such efforts. In some instances, the fact that multiple stipends are being given could indicate a need to reassess the employee’s classification and job assignment to ensure that the core duties are not being supplanted by the additional duties being performed.

**FISCAL IMPACT**

Efforts should be made to reduce costs by at least $500,000 per year by identifying and reducing the use of non-essential stipends. In year one, additional savings will be achieved by returning to a traditional Summer School program. Additional savings may be possible during contract negotiations in future year, but cannot be estimated until negotiations are final.

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>2022-23</th>
<th>2023-24</th>
<th>2024-25</th>
<th>2025-26</th>
<th>2026-27</th>
</tr>
</thead>
<tbody>
<tr>
<td>Organize and Simplify Extra Duty Pay</td>
<td>$1,500,000</td>
<td>$500,000</td>
<td>$500,000</td>
<td>$500,000</td>
<td>$500,000</td>
</tr>
</tbody>
</table>

### 7.2 OUTSOURCING AND CONTRACT SERVICES

During the course of this study, Evergreen examined the programs and services currently being provided through shared services or outsourced/contract arrangements and also assessed what, if any activities or services, might be delivered in an alternative method. Further, Evergreen evaluated the manner in which NPS assesses alternative delivery methods.

**FINDING**

Decisions relating to the use of in-house staff versus the decision to outsource services is not always based on a documented long-term projection of costs and needs.

**Exhibit 7-18** lists some of the major areas where NPS uses contracted services. This list is not intended to be inclusive, but rather to illustrate the full or partial use of contracted services to supplement or supplant the need for in-house staff.
### Exhibit 7-18
Major Contract Services in Norwalk Public Schools

<table>
<thead>
<tr>
<th>Department</th>
<th>Services Outsourced</th>
<th>Vendor</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>General</td>
<td>Substitute Services - Partial</td>
<td>Multiple</td>
<td>NPS has approximately 70 certified and non-certified staff on the payroll, but contracts for substitute services as needed.</td>
</tr>
<tr>
<td>Facilities</td>
<td>Custodial Services - Partial</td>
<td>Affineco, LLC</td>
<td>13 of 21 schools are served by this contract.</td>
</tr>
<tr>
<td></td>
<td>Electrical Services (as needed)</td>
<td>B &amp; F Electric; Grumman Electric, Palmer Electric, and others</td>
<td>Used primarily when certified electricians are needed and when workload is too great.</td>
</tr>
<tr>
<td>Special Education</td>
<td>Various</td>
<td>Various</td>
<td>Special needs services that are beyond staff capabilities.</td>
</tr>
<tr>
<td>Food Service</td>
<td>School Food Services - Partial</td>
<td>Compass Group/Chartwell</td>
<td>A blend of school employees and Chartwell staff are used.</td>
</tr>
<tr>
<td>Transportation</td>
<td>Student Transportation Services</td>
<td>Durham Transportation ECS Transportation Relia Transportation</td>
<td>One NPS employee oversees all transportation contract services.</td>
</tr>
</tbody>
</table>

Source: Compiled by Evergreen, January 2022.

As shown in Exhibit 7-19, NPS made the decision to bring some contracted services being provided to students with special needs in house which, as a result, required the hiring of additional staff. The chart provided during 2021-22 budget discussions relates the increase in the number of special education teachers to the overall reduction in contract expenditures.

### Exhibit 7-19
Staffing Analysis – Special Education
2015-16 to 2021-22 (to date)

Based on an average salary for teachers of approximately $90,000 plus benefits of approximately $22,000 per year for teachers, the annual cost for adding 71 teaching positions between 2016-17 and 2021-22 is estimated at $7,952,000 (($90,000 + $22,000 = $112,000) X 71). If these were the only costs to the District for bringing those services in house, total costs would have increased by approximately $1,783,282 ($7,952,000 minus Contract Service reduction of $6,168,718.00) or 22.4 percent. The Special Education student count increased from 1,527 in 2016-17 to 1,677 in 2020-21, or 9.8 percent.

Assuming the decision to bring the contracted services in-house was made to improve the services provided to students with special needs, this investment was sound.

When determining whether to outsource certain tasks, administrators in the operations areas stated that the rationale was generally based on a need to get the job done in a timely manner. In the Facilities Department, for example, staffing levels in the District are not sufficient to handle all of the repairs and preventative maintenance that are inherent for a District of this size. In some instances, the contracted services reviewed were related to the District’s inability to hire fully certified people for key positions, such as electrical services.

In Transportation, NPS made the decision to outsource the student transportation function many years ago. NPS owns none of the buses used to transport students, and none of the drivers, monitors, mechanics or general support employees are employees of the district. According to the one NPS employee who oversees this program, the contracts have been rebid over time, but no definitive analysis of the cost for the District to provide some or all of those services in-house has been made, primarily because the initial cost of purchasing buses and setting up a fully compliant bus maintenance facility was in and of itself cost prohibitive.

According to industry experts, when there is need for highly technical services or the need is intermittent and would not occupy the time of a full-time employee, it may be more cost effective to contract for the service. Or, if the demand is ongoing with peaks that would demand an excessively large staff, a contract service that can guarantee coverage during peak periods may be more cost effective.

This report contains some recommendations for hiring additional staff or contracting for services to ensure certain functions are effectively carried out. A careful analysis of the associated initial and long-term costs, savings and associated benefits is needed to ensure that the decision to hire or outsource is made based documented analysis.

Exhibit 7-20 shows an analysis performed by the Clay County School District in Florida as they considered hiring additional staff to work exclusively on the grounds instead of contracting for an all-inclusive contract where the contractor would pay their own employees, use their own equipment, provide their own gas, etc.
The Maintenance Director then issued an Invitation to Bid. Based on the three bids received, a contract was awarded to the selected contractor because the bid met all of the criteria established by that district at a significantly lower cost than the cost to perform those services in-house.

According to administrators, prior to any contracted service, NPS has organizational controls in place that require senior staff members to identify actual need, perform a gap analysis, examine previous outcomes, project expected outcomes and the financial impact, and ensure that the proposal is strategically aligned with the District goals and objectives. This process, however, is not documented in policy nor procedure and documentation relating to the decision to hire or contract are not generally maintained as evidence for future department heads or leaders to use when considering options in the future.

RECOMMENDATION

Recommendation 7-5:

Document in policy or procedure the process for justifying both contract services and the creation of new positions, which examines the full cost and benefits of both options.

Establishing outcome-related goals when decisions are made, such as quantifiable goals for program improvements, can also be used to track and monitor the impacts and provide the District an opportunity to modify the approach in order to achieve those goals. For example, the decision to outsource custodial services at some schools is now being monitored to determine whether custodial services at all schools should be outsourced.

FISCAL IMPACT

This recommendation can be implemented with existing resources.
7.3 **MAXIMIZING FEDERAL AND STATE FUNDS**

According to State reimbursement records, NPS has consistently received more than $35 million annually in state and federal grant and program funds. As shown in Exhibit 7-21, funding increased by approximately $10 million in 2020-21 and is expected to remain higher in 2021-22 due to federal dollars allocated for COVID relief efforts.

### Exhibit 7-21

**State and Federal Program and Grant Funds**

2018-19 through 2021-22 (through December 2021)

<table>
<thead>
<tr>
<th>Revenue Source</th>
<th>2018-19</th>
<th>2019-20</th>
<th>2020-21</th>
<th>2021-22 to date</th>
<th>Grand Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adult Education – Cooperative</td>
<td>$52,976</td>
<td>$54,850</td>
<td>$36,265</td>
<td>$144,091</td>
<td></td>
</tr>
<tr>
<td>Adult Education – Provider</td>
<td>$82,402</td>
<td>$82,402</td>
<td>$82,402</td>
<td>$82,402</td>
<td></td>
</tr>
<tr>
<td>Bilingual Education</td>
<td>$124,882</td>
<td>$118,237</td>
<td>$125,037</td>
<td>$368,156</td>
<td></td>
</tr>
<tr>
<td>Child Nutrition State Matching Grant</td>
<td>$53,901</td>
<td>$54,143</td>
<td>$55,789</td>
<td>$163,833</td>
<td></td>
</tr>
<tr>
<td>CV Relief Funds</td>
<td>$9,350,337</td>
<td>$463,873</td>
<td>$5,414,209</td>
<td>$514,920</td>
<td></td>
</tr>
<tr>
<td>ECS Alliance District</td>
<td>$1,344,234</td>
<td>$1,877,399</td>
<td>$2,495,348</td>
<td>$9,398,818</td>
<td></td>
</tr>
<tr>
<td>Education Equalization</td>
<td>$9,848,873</td>
<td>$9,751,068</td>
<td>$10,105,571</td>
<td>$32,027,392</td>
<td></td>
</tr>
<tr>
<td>Emergency Impact Aid for Displaced Students</td>
<td>$65,000</td>
<td>$65,000</td>
<td>$65,000</td>
<td>$65,000</td>
<td></td>
</tr>
<tr>
<td>Emergency Operating Costs Reimb (PEBT)</td>
<td>$17,178</td>
<td>$17,178</td>
<td>$17,178</td>
<td>$17,178</td>
<td></td>
</tr>
<tr>
<td>ESSER-Elem and Secn School Emergency</td>
<td>$1,283,000</td>
<td>$1,699,586</td>
<td>$2,982,586</td>
<td>$5,565,062</td>
<td></td>
</tr>
<tr>
<td>Extended School Hours</td>
<td>$200,817</td>
<td>$206,860</td>
<td>$207,013</td>
<td>$614,690</td>
<td></td>
</tr>
<tr>
<td>Family Resource Center Pgm</td>
<td>$100,000</td>
<td>$101,530</td>
<td>$101,530</td>
<td>$336,516</td>
<td></td>
</tr>
<tr>
<td>First Robotics Competitive Mini-Grant Program</td>
<td>$5,600</td>
<td>$5,600</td>
<td>$11,200</td>
<td>$11,200</td>
<td></td>
</tr>
<tr>
<td>Fresh Fruit and Veg</td>
<td>$28,717</td>
<td>$32,216</td>
<td>$60,933</td>
<td>$60,933</td>
<td></td>
</tr>
<tr>
<td>Health Foods Initiative</td>
<td>$102,699</td>
<td>$103,143</td>
<td>$103,111</td>
<td>$308,953</td>
<td></td>
</tr>
<tr>
<td>IDEA- Part B- Section 611</td>
<td>$757,500</td>
<td>$3,075,045</td>
<td>$20,000</td>
<td>$3,852,545</td>
<td></td>
</tr>
<tr>
<td>IDEA- Part B- Section 619</td>
<td>$85,962</td>
<td>$68,570</td>
<td>$80,393</td>
<td>$243,665</td>
<td></td>
</tr>
<tr>
<td>IDEA-Part B  Section 611</td>
<td>$1,066,168</td>
<td>$1,932,404</td>
<td>$2,998,572</td>
<td>$7,997,144</td>
<td></td>
</tr>
<tr>
<td>Immigrant &amp; Youth Education Program</td>
<td>$60,385</td>
<td>$40,000</td>
<td>$43,836</td>
<td>$144,221</td>
<td></td>
</tr>
<tr>
<td>Magnet School Operating</td>
<td>$1,344,234</td>
<td>$1,343,493</td>
<td>$1,368,756</td>
<td>$4,056,483</td>
<td></td>
</tr>
<tr>
<td>Magnet School-Transportation</td>
<td>$241,347</td>
<td>$263,900</td>
<td>$213,918</td>
<td>$830,022</td>
<td></td>
</tr>
<tr>
<td>National School Lunch</td>
<td>$2,874,297</td>
<td>$2,510,505</td>
<td>-$153,178</td>
<td>$1,352,319</td>
<td></td>
</tr>
<tr>
<td>National School Lunch - Cares Act</td>
<td>$153,178</td>
<td>$153,178</td>
<td>$153,178</td>
<td>$153,178</td>
<td></td>
</tr>
<tr>
<td>National School Lunch - Cares Act</td>
<td>$55,059</td>
<td>$54,474</td>
<td>$51,596</td>
<td>$161,129</td>
<td></td>
</tr>
<tr>
<td>Nonpublic Health Services</td>
<td>$41,924</td>
<td>$48,106</td>
<td>$52,298</td>
<td>$142,328</td>
<td></td>
</tr>
<tr>
<td>State School Breakfast</td>
<td>$361,131</td>
<td>$361,131</td>
<td>$361,131</td>
<td>$361,131</td>
<td></td>
</tr>
<tr>
<td>School Accountability - Summer School</td>
<td>$238,002</td>
<td>$249,030</td>
<td>$727,029</td>
<td>$727,029</td>
<td></td>
</tr>
<tr>
<td>School Breakpoint Program</td>
<td>$551,644</td>
<td>$534,036</td>
<td>$311,447</td>
<td>$1,361,232</td>
<td></td>
</tr>
<tr>
<td>School Breakfast Program - Cares Act</td>
<td>$35,895</td>
<td>$35,895</td>
<td>$35,895</td>
<td>$35,895</td>
<td></td>
</tr>
<tr>
<td>School Readiness and Child Day Care Grant Program</td>
<td>$15,366,943</td>
<td>$5,380,445</td>
<td>$5,623,634</td>
<td>$21,360,987</td>
<td></td>
</tr>
<tr>
<td>Spec Ed-Ag Placements &amp; Excess Cost</td>
<td>$4,274,616</td>
<td>$3,399,450</td>
<td>$3,148,752</td>
<td>$10,722,818</td>
<td></td>
</tr>
<tr>
<td>State School Breakfast</td>
<td>$551,644</td>
<td>$534,036</td>
<td>$311,447</td>
<td>$1,361,232</td>
<td></td>
</tr>
<tr>
<td>Student Support and Academic Enrichment Grant</td>
<td>$110,000</td>
<td>$283,663</td>
<td>$452,177</td>
<td>$452,177</td>
<td></td>
</tr>
<tr>
<td>Summer Food Service Prog - Admin</td>
<td>$15,147</td>
<td>$249,030</td>
<td>$667,705</td>
<td>$667,705</td>
<td></td>
</tr>
<tr>
<td>Summer Food Service Prog - Opr</td>
<td>$38,920</td>
<td>$1,392,137</td>
<td>$2,500,990</td>
<td>$2,500,990</td>
<td></td>
</tr>
<tr>
<td>Summer Food Service Program - Cares Act</td>
<td>$35,895</td>
<td>$35,895</td>
<td>$35,895</td>
<td>$35,895</td>
<td></td>
</tr>
<tr>
<td>Talent Development – TEAM</td>
<td>$35,909</td>
<td>$33,561</td>
<td>$26,025</td>
<td>$95,495</td>
<td></td>
</tr>
<tr>
<td>Title I Improving Basic Programs</td>
<td>$2,423,763</td>
<td>$2,211,098</td>
<td>$2,605,691</td>
<td>$7,300,552</td>
<td></td>
</tr>
<tr>
<td>Title I Part A English Lang. Acquis.</td>
<td>$201,449</td>
<td>$222,769</td>
<td>$214,172</td>
<td>$704,214</td>
<td></td>
</tr>
<tr>
<td>Title I Part A Teachers</td>
<td>$341,830</td>
<td>$230,000</td>
<td>$1,748,738</td>
<td>$1,748,738</td>
<td></td>
</tr>
<tr>
<td>Two Percent Education Cost Share Grant</td>
<td>$201,903</td>
<td>$201,903</td>
<td>$1,909,900</td>
<td>$1,909,900</td>
<td></td>
</tr>
<tr>
<td>Youth Service Bureau</td>
<td>$54,847</td>
<td>$54,847</td>
<td>$54,847</td>
<td>$54,847</td>
<td></td>
</tr>
<tr>
<td>Youth Service Bureau-Enhancement</td>
<td>$6,949</td>
<td>$6,949</td>
<td>$6,949</td>
<td>$6,949</td>
<td></td>
</tr>
</tbody>
</table>

**Grand Total** | $35,533,562 | $35,755,506 | $45,876,128 | $129,981,212

FINDING

Relying on one-time state or federal grants to fund ongoing general operation expenses is imprudent and unsustainable when funds are no longer available.

As discussed in the Financial Management chapter of this report, as of June 30, 2021, NPS had received a total of $45.9 million of grant awards related to COVID relief funds and expended $6.9 million. Approximately $14 million is available through 9/30/23, and $25 million is available through 9/30/24. The bulk of the remaining available balances have been allocated to salaries and related benefits for new teachers, social workers, counselors, and coaches. Other allocations for technology, family center, and training were also made. It is not clear what the plan is to cover these recurring expenses after September 30, 2024. NPS stated that the issue would be addressed in the next budget season.

According to the budget presentation made on January 4, NPS is projecting a sharp decline in overall grant funding. Exhibit 7-22 shows the total line from all grant sources from that presentation.

Exhibit 7-22
Federal, State and Private Funding
2018-19 (Actual) to 2022-23 (Projected)

<table>
<thead>
<tr>
<th></th>
<th>FY 2018-19 Actual</th>
<th>FY 2019-20 Actual</th>
<th>FY 2020-21 Actual</th>
<th>FY 2021-22 Final Approved</th>
<th>FY 2022-23 Projected</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Federal Grants</td>
<td>$5,873,706</td>
<td>$6,370,952</td>
<td>$7,464,320</td>
<td>$7,977,779</td>
<td>$8,018,992.19</td>
</tr>
<tr>
<td>Totals - COVID Related</td>
<td>$0</td>
<td>$0</td>
<td>$18,546,333</td>
<td>$25,651,444</td>
<td>$0</td>
</tr>
<tr>
<td>Totals - State Grants</td>
<td>$17,179,218</td>
<td>$16,972,327</td>
<td>$18,605,020</td>
<td>$18,832,044</td>
<td>$18,485,307</td>
</tr>
<tr>
<td>Totals - Private</td>
<td>$387,089</td>
<td>$121,000</td>
<td>$418,000</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Totals - Fee Based</td>
<td>$1,526,302</td>
<td>$2,085,677</td>
<td>$270,980</td>
<td>$198,031</td>
<td>$302,000</td>
</tr>
<tr>
<td>Totals - All Grants</td>
<td>$24,966,315</td>
<td>$25,549,956</td>
<td>$45,304,653</td>
<td>$52,659,298</td>
<td>$26,806,299</td>
</tr>
<tr>
<td>Annual Change</td>
<td>$583,641.06</td>
<td>$19,754,697</td>
<td>$7,354,645</td>
<td>($25,852,999)</td>
<td></td>
</tr>
</tbody>
</table>

Source: Norwalk Public Schools, FY 2022-23 BOE Approved Operating Budget, January 4, 2022.

Actual reimbursements obtained from the State do not match the numbers shown in this chart and attempts to reconcile the differences were unsuccessful. The primary problem, however, is the fact that NPS and the City established a school budget based on one-time funds that supplanted and delayed the need to address ongoing needs.

This is, unfortunately, not a new situation created by one-time or short-term federal funds. Advanced planning for sustaining stimulus or recovery grants is needed to prevent the “cliff” described in the budget presentation. Assuming the federal government does not insert new dollars into the COVID relief fund, the City of Norwalk and NPS are facing hard decisions relating to future funding.

Although no money is projected above from private grants, the presentation narrative states that NPS is actively seeking funds from external sources to supplement local funding and estimates
that revenues from private sources could reach $2.7 million. While this is a commendable goal, the projected shortfall remains significant.

RECOMMENDATION

Recommendation 7-6:

Establish a joint City/NPS working group to carefully review how the ESSER funds were used and identify the areas where these funds were used to supplant ongoing operations.

Once this analysis is completed, the working group should jointly recommend how to budgetarily sustain the programs that should be sustained and eliminate those that no longer require funding.

Even if additional federal dollars are made available, these funds should not be used as a stop-gap way to balance the budget, but rather should be used to supplement rather than supplant current programs and activities as it is intended.

FISCAL IMPACT

This recommendation can be implemented with existing resources.