



OFFICE OF THE INSPECTOR GENERAL  
MONTGOMERY COUNTY MARYLAND

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MEGAN DAVEY LIMARZI, ESQ.  
INSPECTOR GENERAL

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Review of the Special Event Permit Process

Montgomery County Department of Permitting Services

OIG Publication #26-21

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May 4, 2026

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## EXECUTIVE SUMMARY

As part of our strategic efforts to effectuate positive change outlined in the Office of the Inspector General (OIG) Work Plan for fiscal years (FYs) 2026-2029, we initiated this review to examine the Montgomery County Department of Permitting Services' (DPS) special event permitting process. To ensure public events held in the County are safe for attendees and in compliance with applicable law and regulation, event organizers are required to obtain a Special Event Permit (SEP) prior to their event. The SEP is often referred to as an "umbrella" permit as the process is designed to assist organizers in identifying any additional permits and licenses that may be required for their event.

Based on a survey of event organizers who used the SEP process, we found the majority were satisfied with publicly available information and staff communication during the application process. Some survey participants, however, identified potential areas for improvement. Additionally, through a review of a sample of applications received during FYs 2024 and 2025, we found inconsistencies in how applications were processed and record-keeping. The report includes a recommendation to improve the efficiency of the process and several recommendations from surveyed permit applicants.

### OBJECTIVES

Through this review, we attempted to (1) assess DPS's process for issuing special event permits to determine if it complies with applicable law, regulation, and policy, including whether DPS is ensuring all requirements are met prior to issuing special event permits; (2) determine whether special event permit application fees were appropriately collected, credited, and refunded as necessary; and (3) evaluate whether DPS provides accurate and appropriate guidance to applicants during the special event permitting process.

### SCOPE AND STANDARDS

Our review was conducted from November 2025 to February 2026, in accordance with the Association of Inspectors General, *Principles and Standards for Offices of Inspectors General, Quality Standards for Inspections, Evaluations, and Reviews* (July

### RESULTS

DPS lacks a formal, written policy to govern all aspects of the SEP process, leading to inconsistent practices amongst permit technicians.

### RECOMMENDATION

Develop and implement a formal policy governing the use of SEPs, including a clear description of when permits are required; what steps the permit technicians should take to ensure that other necessary permits are obtained; instructions regarding fee payments, waivers, and refunds; and how documents are collected and stored.

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## BACKGROUND

The Montgomery County Department of Permitting Services' (DPS) primary mission is to "ensure the health, safety, sustainability, and economic vitality of residents, businesses, communities and the built environment in Montgomery County." <sup>1</sup> Under Chapter 30 of the County Code, the County Executive is authorized to adopt regulations related to permits, licenses, and fees as necessary to protect public health, safety and welfare. <sup>2</sup> As part of this regulatory framework DPS has been delegated responsibility for issuing building, electrical, mechanical, and plumbing permits for both residential and commercial projects.

DPS is also responsible for issuing special event permits (SEPs)<sup>3</sup> to individuals or organizations planning to hold public events in the County. The applicable statute<sup>4</sup> states that it is unlawful to hold a "picnic, dance, soiree, party, or other entertainment for gain or profit to which the general public is admitted" without obtaining a permit or license. The SEP program was developed in 2018 to address safety concerns for public events by assisting event organizers with navigating the myriad of County laws, regulations, and inspection requirements involving public events.

Depending on the nature of the event, SEP applicants may need to obtain additional permits from DPS and/or other County agencies. Examples of other permits and licenses include:

- DPS Fire Code Compliance Permits, Special Event Parking Permits, Electrical Permits, Building Permits, Mechanical Permits, Plumbing Permits, Use and Occupancy Certificates, and Benefit Performance Licenses;
- Department of Health and Human Services (DHHS) Food Service Facility Licenses;
- Department of Alcohol and Beverage Services (ABS) licenses;
- Department of Transportation (DOT) special event road closure permits;
- Community Use of Public Facilities permissions to use a County-owned facility; and/or
- Department of Environmental Protection noise waivers.

According to DPS, the SEP is intended to act as an "umbrella" permit which creates an opportunity for DPS to assist applicants with all their permitting needs and ensure compliance with County laws and regulations. While applicants are responsible for obtaining all required permits and licenses needed, DPS staff support this endeavor by identifying necessary items and connecting event organizers with relevant departments and offices. Additionally, DPS publishes

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<sup>1</sup> DPS FY 2026 Approved Operating Budget

<sup>2</sup> County Code, Chapter 30, Section 30-2

<sup>3</sup> Examples of special events include carnivals, fairs, concerts, festivals, fireworks displays, athletic and recreation tournaments. See <https://www.montgomerycountymd.gov/DPS/Process/combuild/Special-Event-DPS.html>.

<sup>4</sup> County Code, Chapter 30, Section 30-1

a variety of informational products to inform event organizers of SEP requirements, including a podcast episode and a Special Events Permit Guidance Document describing the “five steps to permit issuance,” which is available on the DPS website.

The current SEP application fee is \$102.74, and other required permits and licenses may increase the total permitting cost for the event organizer. During fiscal years (FYs) 2024 and 2025, DPS issued 74 SEPs and collected \$14,897.30<sup>5</sup> in permit fees.

	FY 2024	FY 2025
<b>Issued</b>	<b>32</b>	<b>42</b>
Open	6	15
Stop Work	2 <sup>6</sup>	0
Void	39	40
<b>Total Applications</b>	<b>79</b>	<b>97</b>

Table 1: DPS Reported Special Event Permit Application Status by Fiscal Year (as of 10/10/2025)

### Special Event Permitting Process

DPS requires event organizers to obtain an SEP for all events held in the County that are open to the public.<sup>7</sup> Event organizers may apply for the permit directly through the DPS website or by completing a paper form. Upon submission of an application, the information is captured in the DPS permit tracking system, *Infor*, and a payment request is sent to the event organizer prompting them to remit the \$102.74 application fee

Once entered into *Infor*, applications are given a unique permit number and assigned to a permit technician (PT) for processing. The PT will typically send an email to the applicant introducing themselves and scheduling a virtual pre-event meeting to discuss event details and permit requirements. The pre-event meeting includes representatives from other departments from

<sup>5</sup> Because the permit fees are generally nonrefundable, the fees collected are higher than the number of permits issued. Applications may not reach the permit issuance stage for various reasons.

<sup>6</sup> One of the SEP applications in our sample population reached a status of issued but then was changed to “stop work” that same day, due to the applicant’s failure to obtain a required building permit.

<sup>7</sup> Events held in the City of Gaithersburg, the City of Rockville, and on Montgomery County Park and Planning Commission properties are not required to obtain an SEP but may be subject to other permitting requirements.

which the applicant may need other permits or licenses. At the pre-event meeting, the department representatives review the event details to determine whether additional permits or licenses may be needed to hold the event. According to DPS management, applicants are expected to provide evidence that all required permits and licenses have been obtained prior to the issuance of the SEP. DPS staff are expected to withhold the SEP until all event criteria are met.

An internal Standard Operating Procedure (SOP) adopted in September 2024 guides PTs through the processing of SEP applications. Prior to the implementation of the SOP, DPS did not have any policies or procedures governing the SEP process.

### ***Objectives, Scope, and Methodology***

This review sought to (1) assess DPS's process for issuing special event permits to ensure it complies with applicable law, regulation, and policy, including whether DPS is ensuring all requirements are met prior to issuing special event permits; (2) determine whether special event permit application fees were appropriately collected, credited, and refunded as necessary; and (3) evaluate whether DPS provides accurate and appropriate guidance to applicants during the special event permitting process.

We reviewed relevant laws and regulations; interviewed DPS management and staff; and tested a random sample of 47 SEP applications processed in FYs 2024 and 2025. In our sample, 27 of the applications were received prior to the SOP and 20 applications were received after the SOP was implemented. For applications received prior to the SOP, we reviewed *Infor*<sup>8</sup> records and backup documentation for compliance with the process as described to us by DPS management. For applications received after the SOP, we reviewed records and backup documentation for compliance with the SOP and the described process. Shortcomings related to document retention and storage requirements hindered our ability to fully analyze all applications in our sample.

To determine whether special event permit application fees were appropriately collected, credited, and refunded as necessary, we reviewed our random sample of 47 SEP applications. Although our sample did not include any refunded permit fees and only one waived fee, we conducted interviews with DPS management and staff to gain a better understanding of fee waiver and refund practices.

To evaluate whether DPS provides accurate and appropriate guidance to applicants during the SEP application process, we designed a survey to gauge how applicants perceived the guidance received during the application process. We sent surveys to 106 applicants who submitted SEP

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<sup>8</sup>*Infor* is DPS's permitting system used to track and monitor applications. In *Infor*, requirements of an application are referred to as "conditions" that must be approved or waived prior to issuing a permit.

applications during FY24 and FY25 and received responses from 44 applicants, including 27 who accessed the survey link directly and 17 who responded to the survey questions through a telephonic interview with OIG staff.

Our review was conducted in accordance with the Association of Inspectors General, *Principles and Standards for Offices of Inspector General, Quality Standards for Inspections, Evaluations, and Reviews* (July 2024).

## FINDINGS AND RECOMMENDATIONS

We found that DPS does not have a comprehensive policy governing the SEP process. This led to inconsistencies in how SEP applications were processed amongst PTs, specifically whether pre-event meetings were conducted; how PTs verified that other required permits/licenses were obtained; what documentation was obtained; and how documentation was stored. We found that DPS staff appropriately collected and credited SEP fees in our sample population, but DPS lacks clearly defined criteria for waiving or refunding fees.

To gauge public perception of the process, we surveyed applicants who submitted SEP applications during FYs 2024 and 2025. We found that 52% of survey respondents were satisfied with publicly available information regarding the SEP process and 82% of survey respondents were satisfied with their communication with DPS staff during the application process. Of those respondents that obtained other permits or licenses in conjunction with their event, 69% felt that DPS clearly explained any other permits required.

We also invited survey participants to provide recommendations for DPS to improve the SEP process. Although most survey respondents were satisfied with the SEP process, some suggested that DPS should clarify or revisit permit requirements (e.g., when an SEP is required or what is needed for an SEP); improve publicly available information (e.g., clarify the process and requirements listed on their website); improve coordination with other agencies; improve the application system and consistency in processing applications; and improve communication and responsiveness from PTs. We found that these suggestions from event organizers align with issues identified during our testing.

**Finding: DPS lacks a formal, written policy to govern all aspects of the SEP process, leading to inconsistent practices amongst permit technicians.**

Although DPS adopted a standard operating procedure in 2024, the document is primarily a process document with procedural elements instructing PTs on how to process SEP applications in *Infor*. The document lacks specific details and many elements of a formal policy, including a clear description of when an SEP is required, the criteria for a permit to be issued, and the level of information a PT should seek to satisfy that criteria. Additionally, based on our review of sampled applications, not all PTs complied with the written procedure.

Based on interviews with DPS personnel and our analysis of sample applications and survey responses, we noted the following inconsistent practices for various aspects of the SEP application process:

### *Pre-Event Meetings*

The SOP, implemented in September 2024, requires a pre-event meeting with applicants and other stakeholders to ensure the County obtains complete and accurate information regarding the planned event. This requirement stemmed from prior issues with event organizers not including all pertinent information on their SEP application, which resulted in DPS not providing correct guidance regarding necessary permits and licenses.

The SOP requires DPS staff to hold a pre-event meeting and states that its purpose is to verify the event activities and inform the organizer of “ANY additional permit or licensing requirements for their event.” The SOP designates that ABS, DPS, DHHS, and County Department of Police Traffic Operations Section representatives must be included in the meeting and requires that the PT note the date and meeting attendees in *Infor*. In our sample, the pre-event condition in *Infor* was not fully addressed for seven of the 11 (64%) applications that were issued after the SOP implementation date. For four (36%) of those applications, there was no evidence that a pre-event meeting occurred at all. For another application, the *Infor* pre-event meeting condition was marked “approved,” but there were no notes or documentation supporting when it occurred or who attended. In two instances, the PT satisfied most pre-event meeting requirements but did not record the meeting attendees. We were told by a DPS manager that the pre-event meeting may be waived at DPS’s discretion, but this exception is not documented in the SOP.

### *Evidence of Other Permits/Licenses*

We received conflicting information from DPS staff about whether applicants need to provide evidence that they obtained other required permits. The SOP states that the PT must “verify that any/all related DPS permits have been issued,” but it fails to address non-DPS permits or define what specifically should be provided to the PT. One DPS manager and most PTs indicated that they require documentary proof that required items have been obtained prior to SEP issuance. However, others told us that they do not always hold an SEP until other required permits and licenses are obtained. This inconsistency was evidenced in our review of sampled applications. For nine (43%) of the 21 SEPs issued in our sample population, we could not independently verify that the PT obtained evidence that all required permits and licenses were obtained prior to issuance of the SEP. We note that our determination of whether required permits were obtained was hampered because DPS lacks a centralized storage system for SEP documents as well as specific guidance regarding what documentation must be retained.

Additionally, following the implementation of the SOP, DPS included preloaded “conditions” in *Infor* for many of the permits and licenses commonly associated with public events, including ABS, building, electrical, fire code compliance, DHHS, and road closures. For each of these conditions, the SOP requires that the PT enter a result code; and for waived conditions, make notes about why that condition is not applicable for the event. For seven (64%) of the permits in

our sample that were issued after the implementation of the SOP, the PT failed to record a result code for all the pre-loaded conditions.

### *Document Storage*

While the DPS *Infor* system is used to track a permit's progress, status, and any relevant notes entered by DPS staff, it is not a document storage system. For most of its processes, DPS currently uses ePlans<sup>9</sup> to manage workflows and store relevant documentation. The 2024 SOP states, "ePlans (coming soon)," indicating an intention to add an SEP module to the ePlans system;<sup>10</sup> however, DPS management indicated that adding an SEP workflow to ePlans was currently delayed. This means there's no central repository for supporting documentation for each SEP issued.

Some DPS staff told us that they save supporting documentation for SEP applications in their email accounts or on their computer, while others reported that they typically upload SEP files to Documentum, a legacy document storage system that DPS also uses to store files. There is no policy instructing staff where to store documents, and staff stated that they have never been trained on which SEP documents should be maintained.

Staff reported that DPS's lack of specific guidance and centralized document storage system often means that if the assigned PT is out of the office, the application does not progress until the individual returns. This limitation was further evidenced by DPS's inability to provide backup documentation for 13 (28%) of the 47 permit applications in our sample, due to the retirement of the assigned PT.

DPS staff said that adding the SEP process to ePlans would not only provide a file storage system but would also permit DPS to create a workflow in which other DPS divisions and other County departments could make a determination regarding their own permits/licenses and even sign off when they have been obtained. This could lead to greater efficiencies and accuracy in the permitting process and less frustration for both the PT and the applicant.

We also learned that *Infor* is not configured to automatically notify a supervisor or PT if an SEP application remains unaddressed for a set period of time. We observed that in four (9%) of the 47 applications,<sup>11</sup> the *Infor* records did not contain any actions, comments, or notes from the assigned PT and no backup documentation was provided. In each case, the permit was voided months later as the event start date had passed. This led us to conclude that for these four applications, DPS received an application and payment, yet failed to process the SEP

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<sup>9</sup> Within DPS, ePlans is also referred to by its trade name ProjectDox.

<sup>10</sup> ePlans is a part of DPS's eServices suite of tools for customers to apply and pay for permits, upload plans, schedule inspections, request records, submit property complaints, and check the status of permits electronically. <https://www.montgomerycountymd.gov/DPS/Services/eServices.html>

<sup>11</sup> One application was assigned to the retired PT.

application. It is unknown whether these events proceeded without the County determining which permits and licenses were needed to ensure public safety.

While we did not independently review the functionality of ePlans and cannot comment on DPS staff's endorsement of this particular system, we conclude that a defined system of records, coupled with a robust policy regarding what documentation should be collected, would aid in ensuring that the SEP process is more efficient, uniform, and equitable.

### *SEP Fee Payments*

The SOP fails to fully address the SEP payment process, including the timing of payments or when fees may be waived or refunded. County Code<sup>12</sup> states that fees are non-refundable and are to be submitted with the application. The related Executive Regulation<sup>13</sup> states that the fee is non-refundable except in the case of administrative error.

DPS staff told us that fees are refunded when paid in error, such as when applicants apply for events occurring in the Cities of Rockville or Gaithersburg. While this appears to be a reasonable example of an administrative error, other than in this limited instance we found no documentation defining what constitutes an administrative error as outlined in the Executive Regulation. One PT described DPS's refund policy as vague. It may assist PTs to clearly define the specific circumstances under which a refund may be granted.

Our sample contained only one instance where the fee was waived which was done at the direction of the DPS Director and appeared to be related to a customer service issue. While some DPS management and staff indicated that fee waivers are granted for a list of eligible government entities, others could identify no specific circumstances under which a fee waiver would be granted. We obtained the list of eligible government entities utilized by DPS and found that while it addresses fee waivers for other permit types, it does not cover SEPs.

The SOP does not address when fee waivers should be granted for SEP applicants with the exception of a special license, issued to nonprofit organizations, called a Benefit Performance License (BPL).<sup>14</sup> The SOP states that BPLs are "FREE, however, any other permit the event needs may NOT be free." This statement is unclear and conflicts with the DPS fee schedule which states that the "Benefit Performance" fee is \$189.26. In our sampled SEP applications, we observed that the fees for associated BPLs were inconsistently applied. We identified eight SEPs issued wherein a BPL was required. Each of these eight applicants paid the SEP fee; however,

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<sup>12</sup> County Code Chapter 30. Licensing and Regulations Generally, Section 30-2 states, "the permit fee so fixed shall be submitted with the application and is not refundable in whole or in part"

<sup>13</sup> Executive Regulation 11-17, states, "Minimum permit filing and licenses fees are non-refundable, except in the case of administrative error."

<sup>14</sup> County Code, Chapter 30, Section 30-4, states that a nonprofit organization conducting a performance for the exclusive benefit of a volunteer fire department, or a charitable, benevolent, patriotic, fraternal, educational, religious or civic object must obtain a permit.

the BPL fee was waived for six applicants and paid by two of the applicants demonstrating inconsistent treatment of nonprofit organizations. When we questioned DPS management about the BPL fee waivers, they told us that the SOP was incorrect.<sup>15</sup> This inconsistent application of BPL fees demonstrates the confusion that can occur when guidance documents are vague and conflict with other departmental publications.

DPS also lacks a defined policy governing the timing of fee payments. While County Code states that the fee is to be submitted with the application, applicants did not always do so. DPS management told us that an event organizer can submit an SEP application without paying the fee, but they cannot get a pre-event coordination meeting or obtain a permit without payment. We observed that apart from the singular waived permit fee, DPS collected payment for all issued SEPs. However, we noted an instance wherein the applicant received a pre-event meeting and substantive work was completed by the PT, even though the applicant had not paid the SEP fee and canceled the event prior to permit issuance.

We also note that one PT told us that they are not a “stickler” for applicants paying early in the process due to the vagueness of the refund policy. This demonstrates how a lack of definition regarding one aspect of a process may lead to noncompliance in other aspects of the same process. There is no policy regarding the timing of payments, when PTs are supposed to collect payment, and what work is to be done before or after payment is received.

### **Recommendation**

#### **We recommend DPS:**

**Develop and implement a comprehensive policy governing the use of SEPs, including a clear description of when permits are required; what steps the PT should take to ensure that other necessary permits are obtained; instructions regarding fee payments, waivers, and refunds; and how documents are collected and stored.**

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<sup>15</sup> The SOP was updated to remove the language stating that a BPL is “free” shortly after this discussion.

## OIG COMMENTS TO CHIEF ADMINISTRATIVE OFFICER'S RESPONSE

The County Chief Administrative Officer's response to our report is included in its entirety in Appendix A. The response indicates agreement with the OIG's recommendation.

The OIG categorizes progress towards implementation into the following four statuses:

- Open Unresolved: No management response, inadequate response, or no agreement on corrective action plan.
- Open In Progress: Agreed on planned action, auditee is in the process of implementing stated actions, but no evidence of implementation has yet been provided to the OIG.
- Open Resolved: Auditee provided support to OIG indicating implementation was complete, OIG testing to ensure implementation.
- Closed: Recommendation has been implemented.

The following represents the status of recommendations made in this report. The OIG will continue to monitor progress every ninety days towards implementing the County's actions to address the recommendations.

Recommendation Status:

1. Open Unresolved

# APPENDIX A: CHIEF ADMINISTRATIVE OFFICER'S (CAO) RESPONSE

The Chief Administrative Officer provided the following response to our report:



OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich  
*County Executive*

Richard S. Madaleno  
*Chief Administrative Officer*

## MEMORANDUM

April 29, 2026

TO: Megan Davey Limarzi, Inspector General

FROM: Richard S. Madaleno, Chief Administrative Officer *RSM*

SUBJECT: Inspector General Confidential Draft Report: The Review of the Special Events Permit Process (OIG Publication #OIG-26-21)

Thank you for the opportunity to respond to the issues identified in the report. The Special Events Permit (SEP) program within the Department of Permitting Services (DPS) plays a crucial role in Montgomery County by ensuring that public gatherings are safe, well organized, economically viable and beneficial for both participants and the surrounding community. Since the program's inception, the department's main objective with the SEP has been to ameliorate efficiency, transparency, interagency coordination as well as user accessibility and understanding of the permitting process, to the benefit of our many great event organizers.

We acknowledge that there are opportunities to improve procedures and controls within the DPS pertaining to the SEP process. Your report's finding and recommendation will be useful as we continue to improve processes in the future. We are committed to taking appropriate steps to address the report's finding and recommendation, as noted below.

**Recommendation:** We recommend DPS develop and implement a comprehensive policy governing the use of SEPs, including a clear description of when permits are required; what steps the permit technician (PT) should take to ensure that other necessary permits are obtained; instructions regarding fee payments, waivers, and refunds; and how documents are collected and stored.

**Response:** We concur with this recommendation. DPS will implement four (4) strategic steps, with a target completion date of June 1, 2026, for steps 1-3. 1) Work with the Department of Technology and Enterprise Business Solutions to make a firm distinction between SEP and Benefit Performance permits in the DPS Infor permitting system. Each permit type will have the same conditions of approval. 2) Revise and formalize department policies including those that apply to both SEP and Benefit Performance permits. 3) Retrain permit technician staff on the new standard operating procedure and complete assurance checks to ensure that staff is following

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procedures. 4) Revise the guidance document provided to the public and publish it on the DPS website in an accessible format (expected to be completed by July 1, 2026).

Thank you for bringing these matters to our attention.

cc: Fariba Kassiri, Deputy Chief Administrative Officer, Office of the County Executive  
Rabbiah Sabbakhan, Director, Department of Permitting Services  
Michele El-Gamil, Internal Audit Manager, Office of the County Executive