



Richmond City Council

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OFFICE OF THE CITY AUDITOR

REPORT # 2010-08

Audit Report

of the

**Richmond Department of
Community Development
Bureau of Permits and Inspections
Property Maintenance
Code Enforcement Division (PMCED)**

March 2010

OFFICIAL GOVERNMENT REPORT

Richmond City Council
OFFICE OF THE CITY AUDITOR

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*Committed to increasing government efficiency, effectiveness,
and accountability on behalf of the Citizens of Richmond.*

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City of Richmond
City Auditor

Executive Summary

March 1, 2010

The Honorable Members of Richmond City Council
The Richmond City Audit Committee
Mr. Byron C. Marshall, CAO

Subject: Community Development – Property Maintenance Code Enforcement Audit

The City Auditor's Office has completed an operational audit of the Department of Community Development's Property Maintenance Code Enforcement Division (PMCED). This audit was conducted in accordance with generally accepted government auditing standards promulgated by the Comptroller General of the United States. The standards provide a reasonable basis for our conclusions regarding the internal control structure of PMCED and the recommendations presented.

The mission of PMCED is to protect all citizens and visitors' health and safety. The Division follows the Virginia Uniform State Building Code (USBC) and City environmental ordinances as a basis for compliance and citations. The dynamics and the characteristics of neighborhoods are changing; the housing stock is getting older and demands continued repair and maintenance. According to the 2006 – 2008 U.S. Census Bureau, 85% of the housing units in Richmond were built before 1979; of those, approximately 56,500 (60%) of the units were built before 1960. Maintenance of older properties may be expensive. Non-maintenance could result in deterioration of the properties. The widely accepted broken window theory states that blight caused by unabated code violations or other means could encourage criminal behavior. In Richmond, there appears to be a correlation between code violations and crime. Enforcement of code could deter certain types of crime.

The following are the salient findings of the audit:

- PMCED has taken some steps to reduce blight through property rehabilitation. However, based on available data, auditors were unable to determine the total number of properties rehabilitated or the overall impact of these efforts on the resolution of code violations in Richmond. The above efforts are encouraging; however, more efforts are necessary to address citywide code enforcement issues.

- Similar to unmaintained private properties observed during this audit, the auditors also found that certain City owned properties and City rights of way areas were not in compliance with City code. PMCED must communicate code violations on City owned properties to the appropriate agencies.
- A formal written, comprehensive procedures manual was not available within PMCED. Policies and procedures not only help ensure compliance with laws and regulations, but ensure consistency of operations and clarify the expectations and responsibilities of employees in providing service delivery to customers.
- During the audit, 46% of the requested files could not be located. Some of the files may not have been maintained because inspectors have been instructed to destroy environmental files once abated. There was no process in place to ensure that inspection files are adequately maintained and safeguarded. In these circumstances, inadequate enforcement or lack of productivity may not be detected.
- Several files did not include adequate evidence to determine why the case was closed. Auditors noted examples of computer files not being updated. In addition, field observations indicated that cases may not have been properly closed.
- Auditors found that the Supervisors did not monitor field employees' work adequately. File reviews during the period from November 2008 through June 2009 indicated that only 10% of the required 78 field inspections and 60% of the random file checks were conducted.
- Auditors found that 40% of selected vacant properties were not monitored in a timely manner. It is important to monitor vacant and abandoned structures because they invite crime, cause community blight and present potential hazards. The auditors observed that conflicting guidance was provided to staff. The requirements for inspection of vacant properties were changed from 90 days to 45 days and vice versa.
- The performance measures established by the Division do not provide a clear means to evaluate the effectiveness of the program. Overall, PMCED currently lacks appropriate mechanisms to monitor, measure and manage departmental and employee performance. The number of violation identified was inflated in communication to the CAO's office. Adopting outcome measures recommended by Richmond Works would enable the department and City Administration to gauge services provided by this Division.
- A notice of violation must be provided to the property owner before any legal action can be taken. In cases of rental properties and absentee owners, PMCED inspectors must research to determine who owns the property. Through discussions with PMCED personnel and the City Attorney's Office, the overwhelming consensus is that the efficiency of PMCED inspectors could be improved by dedicating one individual to do the research required for locating property owners.

- Based on focus groups input and research done by the City Auditor's Office, it appears that conducting proactive inspections would benefit the City by reducing non-compliance with the City codes. There is a technology already available to the City that could assist in selecting areas for proactive code enforcement for maximum effectiveness.

The City Auditor's Office appreciates the cooperation of the City staff during this audit. A written response to the report including an action plan and target dates for implementation has been received and is an appendix to this report. Please contact the City Auditor's Office if you have any questions or comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Umesh Dalal", with a long horizontal flourish extending to the right.

Umesh Dalal, CPA, CIA, CIG
City Auditor

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COMMUNITY DEVELOPMENT
2010-08
PROPERTY MAINTENANCE CODE ENFORCEMENT DIVISION (PMCED)

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Introduction, Objectives and Methodology

Introduction

The City Auditor's Office has completed an operational audit of the Department of Community Development's Property Maintenance Code Enforcement Division (PMCED). This audit covers PMCED's activities during the 12-month period that ended December 31, 2008.

This audit was conducted in accordance with generally accepted government auditing standards promulgated by the Comptroller General of the United States. The standards provide a reasonable basis for our conclusions regarding the internal control structure of PMCED and the recommendations presented.

Audit Objective

Overall objectives of the audit were to:

- Evaluate the effectiveness and efficiency of PMCED operations; and
- Verify compliance with laws, regulations and policies.

Methodology

To complete this audit, the auditor performed the following procedures:

- Gathered and reviewed background information;
- Interviewed staff and management;
- Reviewed and evaluated policies and procedures;
- Reviewed performance indicators and standards utilized by other cities and counties;
- Reviewed financial and operational/performance information;
- Rode along with field inspectors; and
- Performed other audit procedures as deemed necessary.

***Management
Responsibility***

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

Background Information

Background

Organizationally, PMCED is located within the Permits and Inspections Division of the Department of Community Development. During the audit period, PMCED had 42 authorized positions which included 30 property maintenance inspector positions.

*The Mission of
PMCED is to
protect all citizens
and visitors'
health and safety*

The Mission of PMCED is to protect all citizens and visitors' health and safety and to enrich and assist in the support of vibrant, economically strong neighborhoods and communities through education and enforcement of property maintenance regulations.

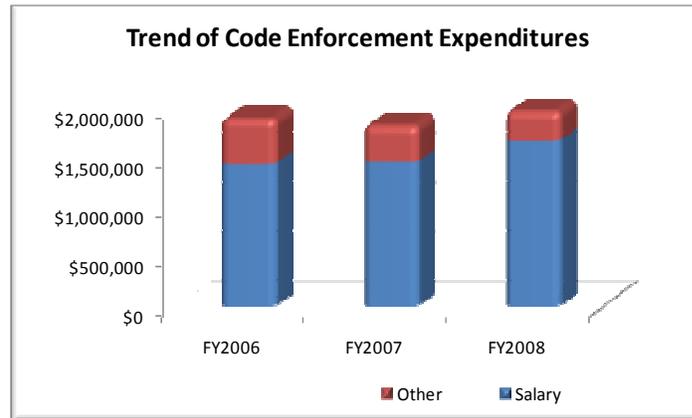
Property Maintenance

PMCED inspectors utilize the property maintenance provisions of the Virginia Uniform State Building Code (USBC) and City environmental ordinances as a basis for compliance and citations. Common building and environmental code requirements focus on: removal of accumulated trash or refuse, tall grass, inoperable vehicles, exterior property violations, building safety issues, and vacant buildings.

Operating Expenses

Operating expenses for PMCED increased from \$1.8 million in FY2006 to \$1.9 million in FY2008, a 4% increase. The slight increase can be attributed to higher payroll costs in FY2008. In FY 2008, PMCED hired four new inspectors. These positions were authorized for the purpose of instituting a Citywide proactive code enforcement program. In addition, a career path was established for existing inspectors, resulting in salary increases and re-classification of some positions.

The following chart illustrates the trend in PMCED expenditures:



The City invests about \$2 million annually in this operation

Current Conditions

85% of housing units in Richmond were built before 1979

The dynamics and the characteristics of neighborhoods are changing; the housing stock is getting older and demands continued repair and maintenance. According to the 2006 – 2008 U.S. Census Bureau, 85% of housing units in Richmond were built before 1979; of those, approximately 56,500 (60%) units were built before 1960. Management reports that there are approximately 1,400 vacant buildings in the City.

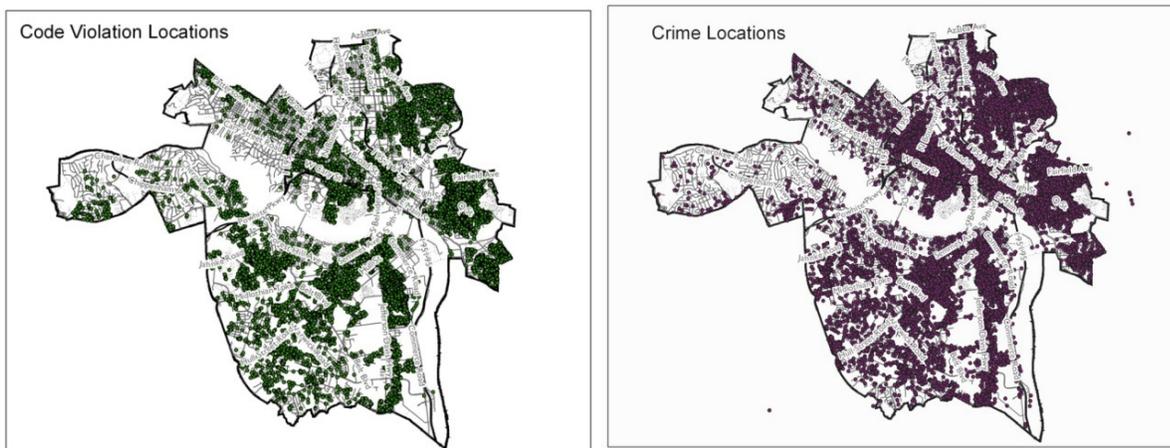
Broken Window Theory

Blight caused by unabated code violations or other means could encourage criminal behavior

The broken window theory is a widely held theory regarding the relationship between community blight and crime. Theoretically, small physical and social neighborhood disorder such as an unrepaired, broken window in an abandoned house, if left unattended will attract vandalism. Further disregard of this property could give the appearance that no one cares. This could lead to the spread of vandalism and may attract criminal elements. Crime and blight could spread. Therefore, this theory, recognized by the law and the code enforcement community, claims that blight caused by unabated code violations or other means could encourage criminal behavior.

***Correlation:
Code
Violations and
Crime***

Auditors compared 2008 code violation data with 2008 crime data for potential relationships between code violations and crime. The following map depicts the distribution of code violations and crime data violations during FY2008:



***In Richmond,
there appears to
be a correlation
between code
violations and
crime***

The above maps depict that areas of high code violations have a higher number of crime incidences. Based on the above results and the broken window theory, there appears to be a correlation between code violations and crime. In addition to making the City aesthetically unacceptable, blight caused by unaddressed code violations may be a factor in encouraging criminal elements. However, the effect that code violations have on crime cannot be quantified.

Blight and neighborhood deterioration are complex issues involving multiple factors such as lack of citizen participation, economic disparity, absentee property owners, and aging housing stock.

***Code
Enforcement
Accomplishments***

An effective code enforcement program can be essential in neighborhood revitalization. One report¹ points out that “Community developers have found that the long-term success of their revitalization work often hinges on cleaning up or redeveloping problem properties that deter investors, frustrate existing residents, and generally contribute to an environment of fear, disorder and crime.”

Although the total impact cannot be quantified, PMCED has made some positive impact through rehabilitation

Illustrated below are photos taken in the City of Richmond which represent an example of the positive impact that can result from PMCED activities. However, based on available data, auditors were unable to determine the total number of properties rehabilitated or the overall impact of these efforts on the resolution of code violations in Richmond.



Before

After

¹ Leveraging Code Enforcement for Neighborhood Safety, LISC



Before

After

The City has taken steps to reduce blight, stimulate economic vitality and improve PMCED operations.

Some steps have been taken to reduce blight

- Recently, in September 2009, the City announced a proposed restructuring of the Economic and Community Development Departments. At the same time, the City announced the implementation of a new Urban Blight Reduction Program. As part of this program:
 - A backlog of 250 violations on privately owned properties which were to be abated by the City Jail inmates and private contractors will instead be handled by the Department of Public Works (DPW).
 - A new memorandum of understanding has been formalized whereby DPW will handle all violation abatements, allowing Community Development to cancel their agreements with Sheriff's inmates and private contractors.
 - The City will work closely with the City Attorney's Office to recover monies paid to contractors when the property owner is unresponsive.

- Additionally, the City is aggressively pursuing violators, recently winning a conviction against one "slumlord" who owns multiple

properties within the City. The owner was given 30 days in jail, fined roughly \$177,000 and ordered to spend 40 days in one of his City properties.

- To help those in need, PMCED also publishes a brochure in an effort to inform citizens of available financial assistance to help resolve code violations.

The Chart below outlines some of the funding available:

Some funding is available to address code violations

Funded By	Description
Elderhomes	Code Enforcement Repair: Assistance for owner occupants who have been cited for code violations who are unable to financially address the problems.
Elderhomes	Emergency Home Repair Program: Grants for emergency home repairs and maintenance for low-income, elderly and/or disabled persons. Limited to an average of \$2,500 per household.
Elderhomes	Low-Income Housing Energy Assistance Program (LIHEAP): Energy assistance home repair grants (primarily heating related) to low income households. Limit of \$2,200 per household.
Elderhomes	Volunteer Home Repair Program: Provides minor home repair services to low-income seniors.
Elderhomes	Neighborhoods in Bloom Rehabilitation Program: Provides forgivable grants of up to \$28,000 to low and moderate income owner occupants for the rehabilitation of their homes in targeted NIB areas.
Elderhomes	Home Rehabilitation Program: Provides a combination of forgivable grants and 0% loans, up to \$28,000, to owner occupants with incomes at 80% or less of AMI for the rehabilitation of owner occupied structures.

Elderhomes	Bellemeade Rehabilitation Assistance: Provides forgivable grants of up to \$28,000 to low and moderate income owner occupants for the rehabilitation of their homes.
Neighborhood Works/ CDC	Home Improvement Loans: Low interest loans to homeowners to make repairs to their property.
City of Richmond	Richmond Rehabilitation of Real Estate Tax Program: Tax Abatement Program for rehabilitation of real estate for older properties with major rehabilitation.

These are just some of the steps already taken to help improve the economic viability of the City, reduce blight and protect the public safety and welfare of Richmond residents.

Observations and Recommendations

Ongoing Efforts

*Significant work
still needs to be
accomplished*

The above efforts are encouraging; however, more efforts are necessary to address citywide code enforcement issues. During the audit, the auditors drove through various areas of the City to determine if code violations could be observed. Throughout the audit, the auditors visited multiple areas, including but not limited to, Beaufont, Peter Paul, Randolph, Piney Knolls, Brauers, Highland Terrace, Southampton, Manchester, Stadium and Woodhaven. The auditors observed a mix of concentrated areas of blight², vacant buildings, tall grass and vegetation, inoperable vehicles, trash, and debris compared to other areas, such as Windsor Farms, Stratford Hills and Westhampton that appeared to be well maintained.

The following pictures depict some of what was observed.



² For the purposes of this report, our use of the word blight will refer to the City Code definition. City Code Sec. 14-202., defines *blighted property* as any individual commercial, industrial or residential structure or improvement that endangers the public's health, safety or welfare because the structure or improvement upon the property is dilapidated, deteriorated, or violates minimum health and safety standards.



Vacant and abandoned structures could invite crime, cause community blight and are potential fire hazards. Accumulated trash can attract rodents and vermin, produce offensive odors and create health hazards. Abandoned/inoperable vehicles can attract rodents, cause environmental contamination through chemical leaks and present potential hazards to children. These types of conditions must be corrected to prevent a cycle of disinvestment and decline in the City.

While it is not suggested that these photos are representative of all areas of the City, it is important to understand what causes these conditions and what the City of Richmond can do to prevent and correct them.

Upon specific inquiry, three PMCED staff members offered possible reasons for the auditors' observations related to unabated blight in the City. They attributed unabated blight to various factors including, 1) the work ethic of individual inspectors, 2) lack of training, 3) excessive reporting and manual processes, 4) lack of standard policies and procedures, 5) insufficient oversight and monitoring by managers and supervisors, and 6) normal processing time.

***Condition of
Certain City
Properties and
Rights of Way***

Similar to unmaintained private properties observed during this audit, the auditors also found that certain City owned properties and City rights of way areas were not maintained properly. The City must maintain its property if it is going to enforce property violations on City residents. Examples of these types of violations are depicted in the following pictures:



Sidewalk on Jeff Davis Highway

2628 Lynhaven Ave

***PMCED must
communicate
code violations on
City owned
properties to the
appropriate
agency***

Citizens are concerned that PMCED does not enforce code requirements on City property similar to the private properties. However, when a complaint is not within PMCED's scope of duty, the Division cannot address it. This may give the appearance that PMCED has not taken action. Better communication among all City agencies will help to alleviate this issue.

Recommendation:

- 1. Establish a policy to communicate to the Department of Public Works (DPW) or the Department of Public Utilities (DPU) any violations not under the purview of PMCED to ensure they are addressed.***

Internal Controls

According to Government Auditing Standards, internal control, in the broadest sense, encompasses the agency's plan, policies, procedures, methods, and processes adopted by management to meet its mission, goals, and objectives. Internal control includes the processes for planning, organizing, directing, and controlling program operations. It also includes systems for measuring, reporting, and monitoring program performance.

Internal controls need improvement

Based on the results and findings of the audit methodology employed, auditors concluded that internal controls need improvement. The internal control deficiencies are discussed throughout the report.

Effectiveness of Code Enforcement

A variety of factors may have contributed to the current conditions. There are two main factors. One is within the City's control; the other is not. The relevant factors are:

1. Inadequate code enforcement
2. Lack of citizen compliance

Policies and Procedures

Due to noted management deficiencies, the effectiveness of PMCED cannot be readily determined. The deficiencies included inadequate oversight, monitoring and management controls. As discussed throughout the remainder of this report, we observed a lack of formal policies and procedures, inadequate file documentation and insufficient performance measures.

Formal policies and procedures are a critical element in the control activities of a department

As noted in the City Auditor's previous audit report in 2005, the City's PMCED continues to operate without a formalized policy and procedures manual. It was noted that PMCED does utilize memos and staff meetings as a means to communicate and disseminate procedural guidance. However, a written, comprehensive procedures manual was

not available. A standard operating procedures manual was originally drafted in October 2007 and then again in October 2008, but was never finalized and distributed.

A formal written, comprehensive procedures manual was not available

Auditors observed that memos to staff provided conflicting guidance on four occasions within a one year period. In these circumstances, the policies and procedures may not be consistently adhered to. Formal policies and procedures are a critical element in the control activities of an organization and department. Policies and procedures not only help ensure compliance with laws and regulations, but ensure consistency of operations and clarify the expectations and responsibilities of employees in providing service delivery to customers.

Recommendations:

- 2. Update and distribute policy and standard operating procedures manuals.***
- 3. Provide on-going training related to compliance with the policies and procedures.***
- 4. Perform an annual review of policy and procedures, and revise as necessary.***
- 5. Monitor on-going compliance with policy and procedures.***

Documentation

Besides a clear understanding of roles, responsibilities and expectations, a lack of formal policies and procedures can have other negative impacts on operations, such as inadequate file documentation, improper handling of files/cases, and non-compliance.

49% of the requested files could not be located

During audit testing to determine compliance with departmental guidelines, laws and regulations, 37 case files were requested. Of the case files requested, 18 (15 environmental and 3 property maintenance folders) or 49% of the requested files could not be located. Some of the files may not have been maintained because inspectors have been instructed to destroy environmental files once abated. This was documented in a memorandum issued by the Operations Manager. However, during discussions with the auditors, the Operations Manager was of the opinion that staff was not supposed to destroy files. There was no process in place to ensure that inspection files are adequately maintained and safeguarded.

As a result of missing files or lack of documentation, the auditor was not always able to determine if these cases were handled in compliance with laws and regulations. However, a review of the system records and files, where available, revealed the following with regards to the 37 cases (containing 99 violations):

Files were not handled in accordance with departmental guidelines

- Two cases with a total of 19 violations in which the inspector regularly re-assigned the case to himself. By doing this, it effectively would give the appearance that the violations were current although no activity or follow-up had been performed.
- One case with 10 related violations where the completion dates were moved forward with no explanation or documented follow-up. Again, this would give the appearance that the violations were being worked on, which was not accurate.
- Three cases were noted in which initial contact was not made in a timely manner, as defined by departmental guidelines.
- Five vacant building cases were noted that did not appear on the vacant property list. Furthermore, the auditor found no indications

that on-going monitoring was being performed in accordance with departmental guidelines for two of the five properties. This observation also creates doubts about the accuracy of the vacant property listing. According to the Property Maintenance Inspector Supervisor, the vacant property list is pulled by selecting properties coded in the system as “vacant”; however, the five properties identified during the audit were coded as “open and vacant” and were therefore not included.

To determine the appropriateness of closing cases, the auditor selected a sample of 60 violations involving inoperable vehicles. Using a “Pictometry” application, the auditor noted that in fourteen cases (23%) the vehicles appear to still be in the same location as they were prior to the time the violation was closed by the PMCED inspector. The auditor also performed an on-site inspection during the audit.

Files did not include adequate evidence to determine why the case was closed

File documentation and case notes do not provide enough evidence to determine why the cases were closed or if they should have been closed. The Operations Manager and Operations Supervisor did agree that the case files lacked documentation.

In another example, the auditor noted that in July 2008, 380 violations were cited in 71 different trailers for numerous infractions such as electrical hazards, roofs and drainage, unsafe structure, exterior walls, inoperable vehicles, and unlawful accumulation of refuse. As of September 2009, 175 of those violations were still reflected as outstanding in the system. Ten cases representing 30 of the 175 violations have been taken to court. During discussion with PMCED personnel, the auditor was told that all the cases were closed with the exceptions of the 10 court cases; however, the inspector had not

updated the tracking system to reflect the current status. PMCED personnel were able to provide a sample of photos which indicated correction of some exterior violations. However, without credible evidence, it is unclear whether interior violations have actually been resolved. Furthermore, if the violations were abated without reflecting this occurrence in the computerized database, a true picture of outstanding violations cannot be obtained.

Inadequate file documentation is a repeat comment which was noted in a previous internal audit report issued in 2005. The lack of detailed documentation and case notes, at times, makes it impossible to determine with certainty whether cases have been properly handled. Furthermore, inadequate or incomplete documentation could hinder the City's efforts to prosecute code violations.

Controls over the closure of cases need improvement

These examples illustrate that controls over the closure of cases need improvement. There is a possibility that the PMCED inspectors may be closing cases prior to their resolution. In this situation, code violations may continue to exist thereby reducing PMCED's effectiveness. On the other hand, if the closed cases are not recorded in the computer system, resources could be wasted in following up on cases that are already abated.

Recommendations:

- 6. Establish file maintenance guidelines through written procedures that include which files and file contents need to be maintained, file storage, file security, and access.***
- 7. Update the computerized database in a timely manner.***
- 8. Refine search to capture all the vacant properties.***

***Monitoring
and Oversight***

In November 2008, PMCED instituted a quality control oversight process. However, the process appears to be ineffective. Policy guidance outlines the following requirements for supervisors:

- Spend a full day with the inspector once every three months;
- Conduct a ride-along review during and after the day of inspections;
- Keep written documentation of field performance evaluations;
- Conduct random file checks;
- Pull at least three files at random for each inspector and conduct independent evaluation – at least every three months;
- Conduct oral counseling/mentoring with staff after file review; and
- Prepare written notes and copy given to operations supervisor.

Using the outline above, supervisors should have conducted 78 field performance evaluations and 234 random file reviews during the period from November 2008 through June 2009. The time period for this review extended outside of the normal scope period as the program was implemented towards the end of the scope period. The auditor observed that during the period only 10% of the required 78 field inspections and 60% of the random file checks were conducted. The auditor further noted that most of the random file checks which were conducted had been performed by one supervisor. This means that other supervisors need to improve their monitoring efforts.

***Supervisors did
not monitor field
employees' work
adequately***

Illustrated below is an example where an inoperable vehicle remained in an identical location even though a code violation was opened and satisfactorily closed. Proper supervision would have detected cases such as this.

This inoperable vehicle complaint was opened based on a citizen complaint in October 2008. According to the PMCED history log, this violation was abated in December 2008. However, as seen in aerial photos taken over the three year period from March 2007 through February 2009, the vehicle was still on the property in the identical location. During on-site inspection, the auditor observed that the vehicle was full of refuse and tall grass had grown around the tires.



Pictometry Aerial Photo taken March 2007



Pictometry Aerial Photo taken March 2008



Pictometry Aerial Photo taken February 2009

The PMCED Operations Manager and the responsible inspector reviewed the auditors' observations and communicated that some of the vehicles had tags and did not appear to be a safety threat and therefore felt the cases could be closed. However, the Code Ordinances specifically require that the vehicles be operable. It is unknown

whether these vehicles are or were operable. Inspectors routinely use their judgment on closing out these types of cases. File documentation should be sufficient to determine or verify the basis for the closure.

Vacant Properties

During another audit test, the auditor selected 30 properties of the 1,389 vacant properties to determine if the properties are being monitored every 45 days as outlined by internal guidelines issued in March 2009. The auditor identified 73 vacant property inspections conducted between April 2009 and September 2009. The scope of this review was determined based on the most recent guidance provided to staff. Of the 73 inspections, 29 (40%) were conducted at an interval greater than 45 days. To reemphasize a point made earlier in this report, it is important to monitor vacant and abandoned structures because they invite crime, cause community blight and present potential hazards. Furthermore, the auditor observed conflicting guidance provided to staff. For example, the requirement for the inspection of vacant buildings was said to be 90 days, yet other times it was stated to be 45 days.

*40% of vacant
properties not
monitored timely*

An essential element of any control environment is the continuous monitoring of activities through proper supervision. Supervision is the on-going oversight, management and guidance to help ensure that objectives are met, both efficiently and effectively. The risks associated with the lack of proper supervisory oversight and quality reviews are:

- Department goals may not be accomplished;
- Laws/regulations and policies may not be complied with; and
- Cases could be closed without proper abatement.

If these events occur, the City could face the following outcomes:

- Properties falling into greater disrepair;
- Potential hazards going undetected;
- An increase in the number of complaints; and
- A loss of public confidence in PMCED.

Recommendations:

- 9. Reinforce and monitor performance of staff at all levels.***
- 10. Enforce requirements for field performance evaluations and random file checks.***
- 11. Require supervisory staff to monitor zones on a routine basis to judge the effectiveness of the inspector. Require a written report of findings.***
- 12. Clarify with staff and document the guidelines for performing vacant property inspections in a formal policy.***
- 13. Monitor vacant property inspections to ensure that established guidelines are being met.***

***Performance
Measurement***

The department has outlined four specific performance measures for PMCED:

1. Respond to 90% of complaints within 10 working days of receipt of the complaint.
2. Perform complaint re-inspection within 10 working days of the re-inspection due date.
3. Inspect 90% of all registered vacant buildings within 45 days of the previous inspection date (measure changed in March 2009).
4. Close out 90% of all environmental complaints within 45 days of receipt of complaint.

Established performance measures do not evaluate the effectiveness of the program

However, it was observed that measures numbered 3 and 4 above are not actively monitored or reported. The performance measures established by the Division do not provide a clear means to evaluate the effectiveness of the program. The requirement of performing inspections and re-inspections within 10 days does not assure any action or resolution of the code violations. Also, there appears to be a need for measures designed to ensure quality verification, monitoring of inspectors' work and accurate recordkeeping. Overall, PMCED currently lacks appropriate mechanisms to monitor, measure and manage departmental and employee performance.

PMCED does provide reports to the CAO's Office and to Richmond Works (a City performance measurement tool). These reports capture information such as:

- number of properties inspected,
- number of violations observed,
- number of property maintenance violations,
- number of environmental violations,
- number of violations closed/open,
- number of proactive/complaint inspections,
- number of follow-up inspections, and
- number of door hangers.

The number of violations reported to the CAO was overstated

Auditors observed that when PMCED reported the "number of violations", that number included proactive as well as complaint-driven inspections where no violations were found. This inclusion inflated the reported number of violations, the number of violations open and the number of violations closed. Additionally, system reports are not maintained to support the reported information. In a review of manual

reports maintained, the auditor noted that the numbers reported from daily logs were at times captured incorrectly.

Richmond Works has recommended other performance measures that have not been adopted by PMCED, including:

- The number of cases brought into voluntary compliance as a percentage of all cases initiated during the fiscal year.
- The number of cases brought into voluntary compliance as a percentage of cases open during the fiscal year.
- The number of cases brought into compliance through administrative/judicial action as a percentage of all cases initiated during the fiscal year.
- The number of cases brought into compliance through administrative/judicial action as a percentage of all case open during the fiscal year.
- The average number of calendar days from case initiation to voluntary compliance.
- The average number of calendar days from case initiation to administrative/judicial process.
- The number of elapsed calendar days from first complaint report until inspector's first inspection by type of complaint (housing, zoning, dangerous buildings, and nuisance).
- The number of elapsed calendar days from first inspection by type of complaint (housing, zoning, dangerous buildings, and nuisance) to voluntary compliance.
- Rates of voluntary compliance as a percentage of all cases initiated during a given period.
- The average number of elapsed days from case initiation to resolution.

*Richmond Works
suggests better
performance
measures*

- The cases brought to resolution through administrative/judicial action as a percentage of all cases opened during the period.

Actual resolution of code violations would indicate the effectiveness of the function. Adopting such outcome measures would enable the department and City Administration to gauge services provided by this Division. The inadequacy of performance measures was also addressed in the City Auditor's previous report issued in 2005.

Recommendations:

14. Report only the actual number of code violations to the CAO.

15. Adopt measures of effectiveness to include the measures recommended by Richmond Works.

16. Maintain source documentation to support management reports provided to the City Administration.

Challenges

PMCED faces challenges in meeting their goals and managing perception. Staff indentified challenges to include staff reductions, budget constraints, absentee homeowners, and a fundamental lack of understanding of PMCED's responsibilities by citizens.

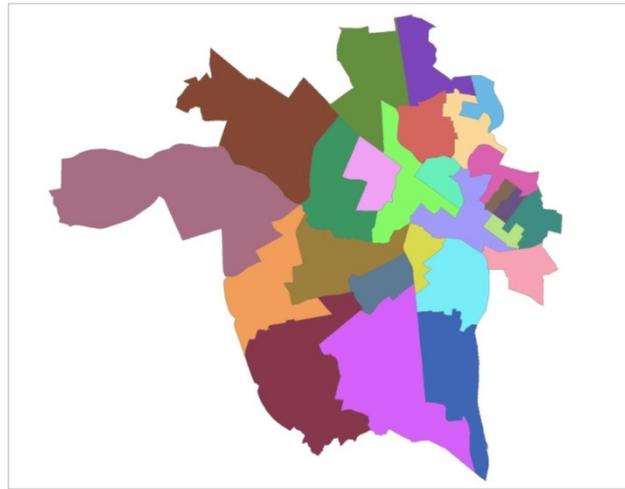
Staffing

As of November 2007, PMCED had 42 authorized positions which included 30 property maintenance inspector positions of which two positions were vacant during the audit. However, auditors noted that in July 2009, five vacant inspector positions were eliminated due to budget constraints.

In early 2008, there were 30 inspection zones and an inspector assigned to each zone. With the loss of vacant inspector positions, the number

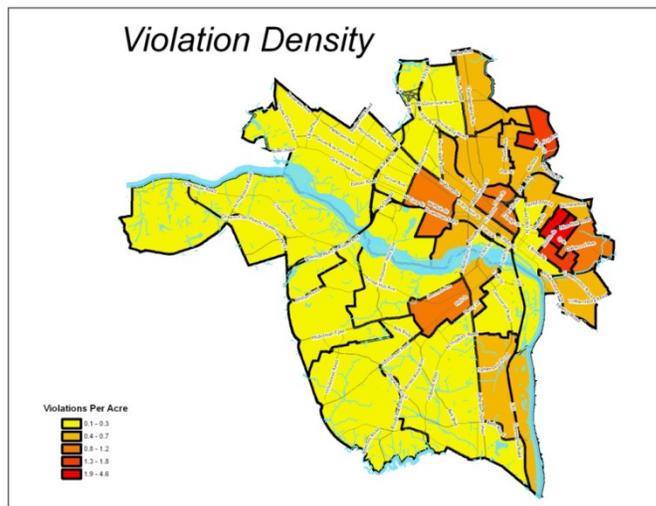
of zones had to be reduced. The map below shows the current twenty-six inspection zones.

Inspection Zones



Source: Community Development Department

Each inspector now has to address a larger number of complaints than they handled before the reduction. It is difficult to determine the impact of this change on the Division's effectiveness due to the lack of adequate data. The following chart shows the density of violations per acre:



Source: Community Development Department

Based on the above data it appears that the Division has appropriately divided the City in zones. The areas of higher density of code violations are assigned smaller zones to enable the inspectors in these zones to keep up with their workload.

Recommendation:

17. Accumulate accurate workload data. Using this data, evaluate the adequacy of existing staffing and justify the staffing changes desired.

***Use of
Volunteers***

Although definite conclusions cannot be drawn about the adequacy of staffing, there may be an inexpensive solution to supplement existing staffing. Section 15.2-1132 of the Code of Virginia allows the Cities of Richmond, Chesapeake, Virginia Beach and Portsmouth, to utilize supervised, trained and qualified volunteers to issue notices of noncompliance. The code further provides that such volunteers shall have any and all immunity provided to an employee of the locality doing an identical job. These volunteers could supplement PMCED staff and accelerate the process of eradicating blight within the City.

***Volunteers could
supplement
staffing without
additional cost***

A neighborhood volunteer program could increase citizen participation, foster partnership with the City, improve the quality of life in the neighborhood while preserving existing housing-stock and enhancing property values.

Other localities, such as Prince William and Fairfax counties in VA, the City of Rock Hill, SC and the City of San Diego, CA have utilized neighborhood volunteers to monitor and report on conditions within their neighborhoods. In general, trained volunteers supported by City inspectors, drive through their respective neighborhoods to help

identify properties exhibiting exterior code violations. The main focus of the volunteers could be on environmental violations (e.g. tall grass and weeds), accumulation of refuse, broken windows, and inoperable vehicles. Procedures could be designed to encourage cooperation from property owners in violation of the City Code. The remaining violations that are not addressed by this friendly approach could be referred to the City.

Recommendations:

18. Develop a pilot proactive code enforcement neighborhood volunteer program to supplement staffing.

19. Recruit, train and supervise individuals for the role of volunteer property maintenance inspectors.

***Researching
Homeowners
Information***

***There is an
opportunity to
improve
inspection
efficiency***

During the course of the audit, a recurring theme arose regarding the time consuming process of finding property owners. A notice of violation must be provided to the property owner before any legal action can be taken. In cases of rental properties and absentee owners, PMCED inspectors must research to determine who owns the property. Once PMCED has made an attempt to serve a notice of action on the property owner, after a set period of time a contractor may be hired if the violation continues to go unabated. Through discussions with PMCED personnel and the City Attorney's Office, the overwhelming consensus is that the efficiency of PMCED inspectors could be improved by dedicating one individual to do the research required for locating property owners. Searching for property owners is a function that could require training as well as expertise in the use of particular software and techniques. This is best performed by an individual dedicated to the task, which could have a significant impact by freeing up time for PMCED inspectors do more proactive enforcement.

Recommendation:

20. To increase staff efficiency, dedicate at least one position for researching and locating absentee landlords and property owners.

***Proactive
Enforcement***

***Increased
proactive code
enforcement is
needed***

Citizen focus group meetings conducted by the City Auditor's Office indicated the need for more proactive inspections. Some of the citizens witness blight and code violations but are reluctant to complain due to the fear of retribution. Beginning in February 2008, PMCED initiated a proactive approach with an increased inspector staff force. The original program allowed for house-by-house and street-by-street inspections. However, with the decline in the number of inspectors and the resulting loss of the authorized positions, PMCED's main focus has reverted back to responding to citizens' complaints. Increased proactive code enforcement is needed to reduce blight and curb neighborhood decline. Utilizing currently available tools, PMCED could sufficiently increase their proactive activities by using the City's Pictometry Field Study System. The system would allow inspectors to target certain areas and locations for proactive enforcement.

Illustrated below is one example of how this technology could be utilized.



Pictometry Aerial Photo taken in March 2008



Pictometry Aerial Photo taken in February 2009

The photos identify an area that has potential code violations that may have been ongoing. This could be a prime area for proactive house-by-house code enforcement activities.

The above technology could provide targeted proactive enforcement, which will enhance effectiveness of the function without committing excessive staff time.

Recommendations:

- 21. Increase inspection effectiveness by enhancing current proactive inspection procedures.***
- 22. Utilize available technology to enhance the ability to identify code violations, monitor inspection zones, and provide greater proactive enforcement.***

Communication

A large portion of PMCED costs are funded through the Community Development Block Grant (CDBG). The CDBG grant for 2007-2008 allocated \$189,776 for Public Services which included funding for private contractors and inmate labor to abate violations from abandoned and non-compliant properties. During 2008, two contractors and one jail inmate team were utilized to cut vegetation, remove trash, etc.

According to the Operations Manager, during 2008 several factors contributed to an increase in the use of and the amount needed for contractor services such as:

- the increased number of inspectors at the beginning of the fiscal year;
- proactive code enforcement activities; and
- a change in philosophy to use contractors over legal proceedings to expedite grass cutting and trash removal versus lengthy court action.

A breakdown in communication created a backlog in grass cutting although the funding was available to address it

According to the Operations Manager, this situation created a backlog of vegetation control tasks and hampered PMCED's ability to cut grass and remove trash in a timely manner. Auditors were informed that the Division exhausted funding prior to the end of the fiscal year. As a result some contractor work was held until the beginning of the next fiscal year. The auditors noted that approximately 184 contractor requests were submitted in the first 10 days of FY09, representing the reported backlog from FY08. However, the CDBG funding allocated for these services was increased by \$100,000 in April 2008 to \$289,776. Through discussions with the Senior Planner for the Housing and Neighborhood Division it was learned that funds had not run out and were available in April 2008. Based on available information, carryover funds have been available in FY 2007-2008 and FY 2008-2009. This situation highlights a lack of fiscal oversight and a serious breakdown in communication within the Department of Community Development. Recently, the name of the department was changed to Planning and Development Review Department.

Recommendation:

23. Improve communication within the Planning and Development Review Department to ensure use of proper information in making operational decisions.

***Vehicle
Shortages***

The primary duty of the inspectors is to conduct field inspections. Obviously, they rely heavily on the availability of a vehicle for their job performance. The Fleet Reduction Program in 2007 reduced the number of vehicles dedicated to the Division. As a result, the productivity of inspectors was negatively impacted. The inspectors are required to get vehicles from the City's motor pool. According to numbers provided by the Operations Manager, during 2008, there were at least 317 instances wherein vehicles were not available at the motor pool when needed. It was noted, with the reduction in staff, this particular problem is no longer a major issue but it did have some negative impact during 2008.

***Public
Perception***

PMCED is required to follow state statutes and allow property owners a certain amount of time for resolution of code violations observed. It could take several weeks for the resolution. Meanwhile, the person reporting the violation may think that no actions are being taken to address the issue and lose confidence in PMCED's ability to deliver services.

During the course of the audit, the auditors conducted three separate focus group meetings. These meetings encompassed a cross section of City Council Districts. The purpose of the focus group meetings was to solicit feedback from the community to understand their experiences

and their needs, particularly with regards to Code enforcement issues. Two overwhelming themes emerged from these meetings: 1) better communication/education is needed between PMCED and residents and 2) PMCED should increase its proactive enforcement.

Public education related to code enforcement may help in addressing negative perceptions

Communication and education need to be improved. While PMCED does typically attend monthly meetings held in each police precinct along with other departments/agencies within the City, there still needs to be greater communication and feedback. Based on the focus group meetings, there appears to be a lack of understanding as to exactly what issues PMCED is responsible for resolving versus what other departments or agencies have the responsibility to address. For example, a citizen may see trash cans in an alley or tall grass on a City right of way and think these are code violations; however these are the responsibility of the Grounds Maintenance Division within the Department of Public Works and not PMCED. The citizens also expressed a desire for greater feedback. There was a sense that violations were called in but never corrected. For instance, if an abandoned vehicle violation was reported but never removed, the caller may believe that nothing came of their report; however, it is possible PMCED did research the complaint and found that the vehicle was not in violation and therefore no action was taken. But without more detailed information and feedback, the caller would not know that the complaint was actually investigated or the findings that led to the closure of the case. In other instances, if PMCED referred the case to a contractor, the complainant may have received notice that the case was closed, however, it may have taken ten days or more after it was assigned before the contractor completed the work; in the meantime it appears nothing was done. Clear communication and education would

help reduce citizen frustration and encourage community involvement and pride.

Recommendations:

- 24. Provide better feedback to the citizens concerning the resolution of code enforcement complaints.*
- 25. Adopt policies and practices that encourage citizen support and neighborhood participation.*
- 26. Solicit feedback from complainants and property owners on their code enforcement experience, where possible.*
- 27. Provide education forums for property owners on basic code enforcement and property maintenance requirements.*

***Possible
Solution***

Urban decline and blight are triggered by a multitude of factors, therefore requiring solutions tailored to the individual needs of the City. As the City continues its commitment to make Richmond a tier one city, a variety of solutions should be explored.

51% renter-occupied housing units in the City

According to a research study³ on “Disinvestment and the Decline of Urban Neighborhoods”, rental properties with absentee landlords are a contributing factor to urban decline. According, to the 2006-2008 U.S. Census Bureau, the City of Richmond had approximately 41,000 renter-occupied housing units, representing 51% of all occupied units. Over time, rental housing often may deteriorate due to deferred maintenance, thereby increasing the risk that conditions within these units pose a health and safety risk to tenants and those living around the property. This deterioration can also result in substandard conditions that adversely affect the economic values of neighboring structures. An

³ A research study on the Disinvestment and the Decline of Urban Neighborhoods conducted by Canada Mortgage and Housing Corporation (CMHC), November 2001.

article⁴ published in the Richmond Times Dispatch in May 2009, reiterated the importance of deck safety after a deck collapsed in Richmond that injured 21 people at one apartment complex.

The most effective way of ensuring that renter occupied housing is in compliance with minimum standards regarding the health and safety of the public is through routine periodic inspections. The Code of Virginia provides for localities to operate rental inspection programs and provides guidelines on how these programs must operate. A number of Code Enforcement departments across the state have adopted a rental-housing inspection program and have reported positive results. Fees charged by jurisdictions range from \$32 to \$50 per inspection. Assuming 20,000 rental units were built before 1960, the program could generate between \$640,000 and \$1,000,000. Fees collected are dependent on the number of rental inspection districts created and the number of rental units within each district.

Recommendation:

28. Implement a pilot rental inspection program. Expand this program if the results from the pilot program are positive.

⁴ Richmond Times Dispatch, "Deck Safety Needs Check", May 5, 2009

**MANAGEMENT RESPONSE FORM
COMMUNITY DEVELOPMENT**

PROPERTY MAINTENANCE CODE ENFORCEMENT DIVISION (PMCED)

#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
1	<i>Establish a policy to communicate to the Department of Public Works (DPW) or the Department of Public Utilities (DPU) any violations not under the purview of PMCED to ensure they are addressed.</i>	Y	Operations Manager (OM) and Engineer II (E2) to meet with DPU OM and DPW OM to work out clear policies and procedures for any violations on City-owned properties and/or violations not under the purview of PMCED. OM to submit procedures to Building Commissioner (BC) for review and approval.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Operations Manager (OM) and Engineer II (E2)		1-May-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
2	<i>Update and distribute policy and standard operating procedures manuals.</i>	Y	OM to complete all draft policies and standard operating procedures (SOP's) by March 15, 2010. OM to submit to BC for his review and approval. OM to distribute finalized policies and SOP's to staff and hold staff-wide meeting with BC in attendance.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM and Building Commissioner (BC)		1-May-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
3	<i>Provide on-going training related to compliance with the policies and procedures.</i>	Y	In addition to the currently scheduled bi-weekly meetings with PMCE staff -- establish separate meetings on a quarterly basis to review policies and procedures. Provide additional trainings for employees who are not following policies and procedures.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM, E2, and BC		7/1/2010 and ongoing
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
4	<i>Perform an annual review of policy and procedures, and revise as necessary.</i>	Y	Conduct annual review beginning July 1, 2010
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM and BC		7/1/2010 and ongoing
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
5	<i>Monitor on-going compliance with policy and procedures.</i>	Y	State as a "priority" on each PMCE employee's evaluation that he/she will read and adhere to all PMCE Policies and SOP's.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM, E2, and Supervisors		1-Jul-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
6	<i>Establish file maintenance guidelines through written procedures that include which files and file contents need to be maintained, file storage, file security, and access.</i>	Y	Written procedures for file maintenance will be included in the finalized SOP Manual
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM		1-May-10

#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
7	<i>Update the computerized database in a timely manner.</i>	Y	SOP Manual to include clear directives for closing cases in the computerized database. Supervisors to spot check inspectors' work once a week to ensure that they are closing cases that are in compliance and that they are <u>not</u> closing cases that are not in compliance.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM, E2, and Supervisors		May-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
8	<i>Refine search to capture all the vacant properties.</i>	Y	In addition to properties labled "vacant" -- add "open and vacant" coded properties to those that are pulled for the Vacant Property List. If this is not a revision that DIT can make within the next three months, then the revision will be made when we implement the new computerized reporting/tracking system in 2011. Obtain "inactive water account" information from DPU for properties that have not had water connection for twelve (12) or more months. Obtain tax delinquent information for each property suspected of being vacant. Ensure that inspectors continually monitor these properties.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM and DIT		1-May-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
9	<i>Reinforce and monitor performance of staff at all levels.</i>	Y	OM, E2, and BC to meet with Supervisors to review Quality Control procedures. Supervisors to document all QC actions. OM to monitor Supervisors' QC each month.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM, E2, and BC		Begin monthly review 1 April 2010
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
10	<i>Enforce requirements for field performance evaluations and random file checks.</i>	Y	Clear Quality Control (QC) requirements will be added to the Employee Evaluation Priorities for the OM, E2, and Supervisors. BC to ensure that requirements are being followed. Non-compliance with standards will be reflected in Employee Evaluations. OM to conduct drive throughs in a different Inspection Area each week -- and document findings. Properties that chronically remain in blighted condition to be investigated by OM. BC to conduct drive throughs each month with OM -- and document findings.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	BC, OM, E2		1-Jul-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
11	<i>Require supervisory staff to monitor zones on a routine basis to judge the effectiveness of the inspector. Require a written report of findings.</i>	Y	See Item 10 above
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	BC, OM, E2		1-Jul-10

#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
12	<i>Clarify with staff and document the guidelines for performing vacant property inspections in a formal policy.</i>	Y	Requirements for the monitoring of Vacant Properties will be added to the SOP Manual and reviewed with inspectors.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM		1-May-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
13	<i>Monitor vacant property inspections to ensure that established guidelines are being met.</i>	Y	Vacant Property monitoring requirements will be added to Employee Evaluation Priorities list. Supervisors to check on each employee's monitoring and their performance will be reflected in the Employee Evaluations.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM, E2, Supervisors		1-Jul-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
14	<i>Report only the actual number of code violations to the CAO.</i>	Y	Number of violations will be reported as a <u>separate</u> item from number of inspections (where no violations were found). PMCE has had difficulty with its current computerized reporting/tracking system. The Department of Planning & Development Review (DPDR) is in the process of purchasing a new computer reporting/tracking system. This system should be operational by January 2011 and allow for quicker and more accurate reporting.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Director and BC		June 2010 through 1/1/2011
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
15	<i>Adopt measures of effectiveness to include the measures recommended by Richmond Works.</i>	Y	These measures will be added to the new reporting system (see Item 14 above).
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM		June 2010 through 1/1/2011
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
16	<i>Maintain source documentation to support management reports provided to the City Administration.</i>	Y	All efforts will be made to maintain source documentation given the limitations of PMCE's current computerized reporting/tracking system. The new system will address vital source documentation maintenance. OM to set clear policies/procedures for maintaining paper documentation where computerized documentation cannot be maintained.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM		March 2010, January 2011 and ongoing

#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
17	<i>Accumulate accurate workload data. Using this data, evaluate the adequacy of existing staffing and justify the staffing changes desired.</i>	Y	OM to prepare monthly data reports to BC regarding workloads in each Inspection Area. Supervisors to inform OM of their observations and analysis of workloads for each of their inspectors.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM, BC		1-Jul-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
18	<i>Develop a pilot proactive code enforcement neighborhood volunteer program to supplement staffing.</i>	Y	PMCE staff has spoken with the Carytown Merchants Association about a volunteer program. OM will follow up on this and develop clear guidelines for the program. BC to review and approve.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM, BC		1-Jul-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
19	<i>Recruit, train and supervise individuals for the role of volunteer property maintenance inspectors.</i>	Y	See Item 19 above.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM, BC		1-Jul-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
20	<i>To increase staff efficiency, dedicate at least one position for researching and locating absentee landlords and property owners.</i>	Y	BC to explore staffing options for this function given staff constraints. If an employee is available, then will implement by July 2010. If no employee is available, then we will request a new position during the budget cycle.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	BC		1-Mar-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
21	<i>Increase inspection effectiveness by enhancing current proactive inspection procedures.</i>	Y	Staff will be trained to better address obvious code violations that have not been reported. Particular attention will be given to properties on major corridors and highly visible areas.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM, E2, BC		1-Jun-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
22	<i>Utilize available technology to enhance the ability to identify code violations, monitor inspection zones, and provide greater proactive enforcement.</i>	Y	New computerized reporting/tracking system will enable us to do better reporting, monitoring, etc. Staff will be trained to use Pictometry (aerial photography) more effectively as a monitoring tool.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM and BC		May 2010 and January 2011

#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
23	<i>Improve communication within the Planning and Development Review Department to ensure use of proper information in making operational decisions.</i>	Y	Monthly meetings to be held between OM, E2, and BC to ensure that proper information is provided in order to make operational decisions, i.e., available funding for DPW grass cutting.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM, E2, BC		March 2010 -- ongoing
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
24	<i>Provide better feedback to the citizens concerning the resolution of code enforcement complaints.</i>	Y	PMCE has problems with the existing 311/CRS reporting system. The new computerized reporting/tracking system that is planned to be operation in Janaury 2011 should eliminate current reporting problems. In the meantime, staff will be trained to contact complainants directly (if contact information is provided) to provide updates. In addition, all non PMCE violations will be reported expeditiously to the appropriate department.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM		6/1/2010 and January 2011
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
25	<i>Adopt policies and practices that encourage citizen support and neighborhood participation.</i>	Y	See Item 24 above. In addition, OM will be required to attend at least one civic association meeting per month to educate citizens and encourage greater neighborhood involvement. Inspectors will be required to attend Civic Association meetings at least twice a year to provide specific information on pending cases and obtain information on new complaints from citizens. Our Department has recently started an e-newsletter -- in which we will add educational items regarding PMCE matters.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM		Jul-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
26	<i>Solicit feedback from complainants and property owners on their code enforcement experience, where possible.</i>	Y	A random survey form will be developed and issued to Civic Associations and citizens.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM		Jul-10
#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
27	<i>Provide education forums for property owners on basic code enforcement and property maintenance requirements.</i>	Y	OM will lead bi-annual education forums in various parts of the City.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM		Jul-10

#	RECOMMENDATION	CONCUR Y-N	ACTION STEPS
28	<i>Implement a pilot rental inspection program. Expand this program if the results from the pilot program are positive.</i>	Y	An Ordinance will be written and presented to the City Administration for their review. The pilot program will focus on a neighborhood with high numbers of rental property violations. We need to ensure that there is adequate staff for such a new program.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OM		Jan-11