CITY OF SAN ANTONIO

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February 15, 2024

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Councilman, District 9

Marc Whyte
Councilman, District 10

SUBJECT: Audit Report of Audit of Development Services Department Code Enforcement

Mayor and Council Members:

We are pleased to send you the final report of the Audit of Development Services Department Code Enforcement. This audit began in August 2022 and concluded with an exit meeting with department management in October 2023. Management's verbatim response is included in Appendix B of the report. The Development Services Department management and staff should be commended for their cooperation and assistance during this audit.

The Office of the City Auditor is available to discuss this report with you individually at your convenience.

Respectfully Submitted,

Kevin W. Barthold, CPA, CIA, CISA
City Auditor
City of San Antonio

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Erik Walsh, City Manager
Roderick Sanchez, Assistant City Manager
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CITY OF SAN ANTONIO
OFFICE OF THE CITY AUDITOR

DEVELOPMENT SERVICES DEPARTMENT
AUDIT OF CODE ENFORCEMENT
PROJECT NO. AU23-009
February 15, 2024

KEVIN W. BARTHOLD, CPA, CIA, CISA
CITY AUDITOR

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Executive Summary

As part of our annual Audit Plan approved by City Council, we conducted an audit of the Development Services Department (DSD), specifically its Code Enforcement Division. The audit objectives, conclusions, and recommendations follow:

Determine if:

- Code Enforcement processes are consistent, sufficiently documented, and in compliance with statutes, ordinances, and internal policies.
- Property abatements are handled in accordance with relevant statutes, ordinances, and internal policies.

The Code Enforcement Division is conducting inspections and property abatements as required by law, local regulations, and their internal policies. However, its standard operating procedures (SOPs) are out of date and its personnel have not been following a unified approach to keeping important records organized and easily accessible during the entire record retention period. During our audit, we also found coding mistakes in the automated reports that Code Enforcement uses to calculate its performance metrics. Lastly, we identified a situation in which personnel were sharing Accela accounts, which is against City Administrative Directives.

We provided recommendations to management to strengthen controls and resolve identified issues. DSD management agreed with the audit findings and has developed positive action plans to address them. Management's verbatim response is in Appendix B on page 14.

Background

The Development Services Department (DSD) Code Enforcement division is responsible for enforcing regulations related to:

- Property use (zoning and other development requirements)
- Building and premises maintenance (City Code Chapter 6, Article IV)
- Dangerous structures, including emergency demolitions (City Code Chapter 6, Article VIII)
- Inoperable vehicles (City Code Chapter 6, Article X)
- Other quality of life related codes

Code Enforcement personnel respond to complaints about code violations made directly from citizens via the 311 customer service line, the 311 app, or via other means. They also proactively enforce violations they discover without a citizen complaint. Code Enforcement is comprised of the following teams and units:

- Field Enforcement Units
- Graffiti Abatement
- Neighborhood Enhancement Team
- Zoning/Permitting Unit (not included in our scope)

There are 88 enforcement officers assigned to 10 Field Enforcement Units (Unit). Each Unit provides inspection and enforcement services across the City. Graffiti personnel use paint, chemicals, and power-washing to remove graffiti from public rights of way, City properties, and private property (as allowed by the owner). The Neighborhood Enhancement Team also provides inspection and enforcement services across the City but does so by focusing neighborhoods or corridors with high complaint volumes in a single sweep within a short amount of time.

For inspections (excluding graffiti) closed in fiscal year (FY) 2022, the top code violations were:

Table 1. Top Code Violations for FY 2022

Violation Type	Total Failed Inspections
Overgrown Yard-Trash	24,084
Bandit Signs	14,892
Alleyway Maintenance	9,101
Front & Side Yard Parking	8,189
Vacant-Overgrown Property	4,917
Vacant Lot	4,801
Junk Vehicle	3,996

Source: Accela

In our population of records closed within FY 2022, there were approximately 112,053 initial inspections, not counting graffiti or bandit signs. The table on the next page breaks down the

inspections by council district and whether they were the result of a complaint (reactive) or observation by a code enforcement officer (proactive).

Table 2. Initial Inspections by Council District and Source of Complaint

Council District[1]	Proactive	Reactive	Total[2]
1	10,136	6,920	17,056
2	11,468	6,539	18,007
3	11,299	5,676	16,975
4	4,601	4,196	8,797
5	7,136	6,290	13,426
6	4,004	3,523	7,527
7	3,279	5,205	8,484
8	2,191	2,165	4,356
9	1,455	1,978	3,433
10	3,556	4,379	7,935
0	177	218	395
NULL	1,035	4,627	5,662
Grand Total	**60,337**	**51,716**	**112,053**

Source: Accela (no graffiti or bandit signs) inspections closed in FY 2022.

When a complaint is lodged, a code enforcement officer will conduct an initial inspection to determine if there is indeed a code violation. We noted that approximately a third of all initial inspections resulted in an invalid[3] case or a no violation finding. If a violation is found, the owner will be given a notice of violation that specifies the time allowed to correct it. The officer will re-visit the site after the appropriate amount of time to confirm the violation was remediated. If it has not been remediated, the officer will issue a citation, which is a court summons. If the owner takes care of the violation prior to the court date, a reduced fine could be negotiated. If the problem persists up to the court date, the administrative court will fine the owner if it upholds the violation. There are various alternative procedures depending on the type and severity of the violation. If the owner does not abate the property at the end of the process, Code Enforcement will hire a contractor to abate the property and bill the owner for the cost plus an administrative fee and interest.

[1] Council district "0" means the address was outside the San Antonio City limits and council district "NULL" means that the location was not verified by the City's geographical database.
[2] Totals are overstated as some records are assigned to multiple council districts.
[3] Invalid cases include duplicates and cases that need to be reassigned or reclassed.

Audit Scope and Methodology

The audit scope was the Development Services Department Code Enforcement division operations from October 1, 2021 through September 30, 2022 (fiscal year (FY) 2022), with older or more recent information as necessary. It included Accela records closed in FY 2022, including cases before the Administrative Hearing Office (AHO) and Building Standards Board (BSB), work orders, and investigations with types:

- Dangerous Premises Investigation
- Graffiti Investigation
- Overgrown Yard Investigation
- Property Maintenance Investigation
- Vehicle Investigation
- Water Concerns Investigation

We specifically excluded permit investigations, license investigation, and zoning investigations (e.g., scrap yards, used mattresses, running businesses in the wrong zone, boarding houses, etc.). We selectively excluded bandit signs from some tests but kept them for analysis purposes.

To gain an understanding of department operations, we interviewed Code Enforcement personnel and conducted walkthroughs of processes including graffiti abatement, code enforcement, neighborhood enhancement team, and billing for owners. The primary criteria for this audit included standard operating procedures (SOPs), City Administrative Directives, City Code, San Antonio Property Maintenance Code, and vendor contracts.

We assessed internal controls relevant to the audit objective. This included a review of SOPs, authorization practices for work orders, contractor assignment practices, and supervisory monitoring. We performed sample testing to determine if inspections and graffiti remediation were appropriately documented, if escalations happened prematurely, if notices of violation were issued appropriately, and if written consent to enter premises was obtained by staff. We tested supervisory review over work orders, the process of distributing work to contractors, payment of contractors, and billing of owners.

We relied on computer-processed data in the City's accounting system SAP to validate payments to contractors and in the City's Mainframe system to validate owner billing. We also relied on information in Accela, a workflow and record management system used by Code Enforcement. Our reliance was based on performing direct tests on the data rather than evaluating the system's general and application controls. We do not believe that the absence of testing general and application controls had an effect on the results of our audit.

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

Audit Results and Recommendations

The Code Enforcement Division is conducting property abatements in accordance with relevant statutes, ordinances, and internal policies. Our testing found that violations were appropriately handled, with notices of violations being placed on the doors/properties and mailed as required. Moreover, tested cases involving structural violations brought before the Building Standards Board were supported by the necessary documentation. We also conducted tests to determine whether contractors were assigned abatement work equitably and confirmed that such assignments were indeed fair.

However, there are areas within the Code Enforcement division that require improvement. Code Enforcement lacks up-to-date standard operating procedures (SOPs) hindering consistent operations. Additionally, personnel have not implemented a cohesive strategy for organizing and retaining relevant documentation impeding efficient retrieval. Lastly, we identified coding errors in the automated reports used by Code Enforcement during the audit scope period to calculate performance measures as well as an instance of employees sharing a system account.

A. Use of Accela

Code Enforcement personnel are not including all relevant documentation in Accela as required, such as before-and-after pictures of violations, pictures of no-violation findings, inspection notes, approved work orders, support documentation for administrative hearings, and graffiti remediation details.

We selected a sample of 68 code enforcement inspections and found that all had the inspection tab filled out. However, we found:

- 50 of 68 lacked photos in Accela and they could not be located by DSD staff.
- Two of 68 did not have investigative notes.

We also selected a sample of 26 Graffiti inspections and found:

- 20 of 26 inspections did not have supporting photos.
- Seven of 26 inspections lacked information in the custom list tab, the graffiti equivalent of inspection notes.

We also found inconsistency in the format and contents of administrative hearing files we tested. Some files were hardcopies, some were stored in Accela, and some were digital scans outside of Accela. Our test of 10 administrative hearing files also identified content deficiencies. Specifically:

- Four lacked information on the outcome of the hearing, such as a hardcopy outcome form or information in Accela detailing the final disposition, fines levied, etc.
- Three had no photographic evidence of the notice of violation.
- Two were devoid of images illustrating the property's condition within two days preceding the hearing.
- One had no copy or picture of the citation.

- One had no inspection comments describing what and when the Code Enforcement Officer observed at the property.
- One did not have multiple photos taken over a period of time illustrating the ongoing nature of the violation.

We also found that work order documentation is inconsistently retained in Accela. Furthermore, work orders in Accela can be closed without being issued to a contractor. We selected a sample of 25 work orders and found that 10 were never issued. Of the 15 remaining work orders, one had no before-and-after pictures and no evidence of proper approval of the manager for a higher dollar work order. Additionally, the current Accela system lacks an option for canceling work orders.

DSD SOPs mandate thorough photographic documentation of code violations, notice postings, and remediation of properties. Specifically, SOP 610 “Photo Taking Process” requires photos of non-violation cases, initial inspections, all re-inspections, towing of vehicles, notice postings, remediated properties, and any dangerous premises walkthroughs. SOP 624 “Administrative Case Filing” requires the file contain a copy of:

- The citation
- The Code Enforcement Report
- All relevant photographs
- Bexar County Appraisal District (BCAD) Appraisal Details
- Water records (not applicable to all cases)
- Current Database System (Case Notes)
- Notice of Violation

Work orders, which authorize contractor hiring and payment for code violation remediation, should be documented and retained in a manner consistent with standard City purchasing procedures. Moreover, approvals at various management levels should be appropriately documented, especially for higher-value work orders and those involving substantial debris or changes to the original work order.

The absence of various types of documentation in Accela can be attributed to personnel storing their documentation in diverse formats and locations. In the case of graffiti abatement, supply chain issues during our audit's scope period limited the ability of some abatement personnel to use Accela in the field because they did not have City-issued cell phones, or their cell phones were not compatible with Accela. Only eight out of 15 abatement employees had the necessary cell phone access, photo-taking capabilities, and mobile Accela access. Additionally, during the scope period of this audit, there were issues that affected all Code Enforcement personnel, such as Accela running slowly or being frequently unavailable, as well as spotty cell phone access in the field. Consequently, personnel stored their photographs in different locations, such as laptop hard drives, personal cloud storage, shared drives, or mobile phones. This fragmentation hindered the retrieval of photographs during testing due to the lack of a coherent organizational structure and the departure of some personnel from City employment.

In the case of work orders, the SOP 620 "Abatement Procedures for Vacant Lots" section 620.09 instructs supervisors and managers to utilize shared directory folders for processing work order approvals, rather than the Accela workflow process.

Consequently, documentation related to inspection, remediation, hearing, and work orders is difficult to retrieve at a later date. Given that this documentation is subject to record retention laws and may be requested by the public, DSD could potentially face legal issues for its inability to produce such information. Furthermore, uniform and comprehensive storage in Accela of all evidence needed for hearings (BSB or AHO) would reduce preparation time and save the cost of paper and long-term storage.

Recommendations

The DSD Director should:

- Require DSD personnel to use Accela as the system of record (except when law requires hardcopies to also be kept) so that all documentation related to complaints, inspections, work orders, and cases is in one location. This includes: 1) documenting field notes in Accela; 2) taking photos as required by SOPs and placing all of them in Accela; 3) placing scans of all relevant documents in Accela; 4) documenting supervisory/managerial approvals in Accela; and 5) entering in Accela the results of court cases and hearings, including fines levied.
- Update SOPs to specify: 1) which fields in Accela are mandatory to use; 2) where each type of documentation is to be stored; and 3) that Accela is to be used as the official system to manage Code Enforcement workflow (see also Issue B).
- Implement the ability to cancel a work order in Accela.

B. Performance Measures and SOPs

Code Enforcement's SOPs are outdated, inconsistent, and do not clearly define its performance measures. Additionally, reports used to calculate performance measures during the scope period were inaccurate.

Code Enforcement's performance measures include the following:

- Percent of Tier 1 and Tier 2 cases that comply within 45 days of initial investigation of code violation
- Business days to respond to Tier 1 code complaint
- Business days to respond to Tier 2 code complaint
- Percent of Tier 1 and Tier 2 cases proactively identified
- Turnaround time from initial cleanup of all graffiti on the public right-of-way
- Number of graffiti sites abated

These performance measures are communicated in the Adopted Budget, but do not specify which violations are tier 1 and tier 2, nor do they indicate that the population of the first measure (45-day closure rate) is a sub-population of tiers 1 and 2 (not all tier 1 and 2 violations are required to be resolved within the 45-day closure rate). The following table, provided by DSD

management, shows which violations are and are not subject to the 45-day closure performance measure:

Table 3. Tier 1 & 2 Investigations Included in the 45-day Closure Performance Measure

Investigation Types Included	Tier
Broken Sewer Line	1
Dangerous Premises Emergency Demolition	1
Dumpster Maintenance	1
Improper Sewer Connection	1
Overgrown Yard-Trash	1
ROW - Brush-Debris	1
Vacant Lot	1
Vacant-Overgrown Property	1
Alleyway Maintenance	2
Front-Side Yard Parking	2
Occupied - No Water Service	2
Water Causing Mosquito Concern	2
Water Concerns-Swimming Pool	2
Water-Sewer Leak	2
Zoning-Oversized Vehicle	2

Source: DSD Management

Table 4. Tier 1 & 2 Investigations Excluded from the 45-day Closure Performance Measure

Investigation Types Excluded	Tier
Visual Obstruction	1
Certificate of Occupancy	2
Dangerous Premises BSB Processed	2
Junk Vehicle	2
Multi-Tenant - Exterior	2
Multi-Tenant - Interior	2
Permits - Garage Sale	2
Permits - Mobile Homes	2
Permits - Short-Term Rentals	2
PMT-Building Without A Permit	2
Scrap Tire Transporter	2
Structure Exterior	2
Structure Interior	2
Zoning - Commercial District	2
Zoning - Lighting	2
Zoning - Property Setback	2
Zoning - Residential District	2

Source: DSD Management

The most recent version of the SOPs was revised in FY 2022, but still references the system used prior to Accela. The SOPs are also inconsistent. For instance, within the SOPs, several

sections outline the prioritization of different violations into tier levels as well as prescribe timelines for initial inspection and for remediation. However, significant disparities exist between each of these SOP sections and their implementation in Accela. For example, Accela classifies oversized vehicles[4] as tier 2 violations, a classification consistent with Appendix D of the SOPS. But SOP 607.E and a section titled “Code Violations List for ECCO5” classify oversized vehicles as tier 3 violations. Additionally, Accela categorizes dangerous premises warrant assessment as tier 4 violations, while SOP 607.E designates them as tier 1, with no classification in Appendix D. These inconsistencies in tier level assignment and deadlines across different SOP sections create ambiguity in the definitions of the first four performance measures.

Furthermore, Graffiti SOPs do not provide the definition of the graffiti-related performance measures. The definition of a “site remediated” relies on an informal and subjective approach. For instance, personnel indicated that remediating 100 square feet using paint or power washing constitutes one site, but only 10 square feet are required for one site if chemicals are used. However, if the location is a pole, it is considered one site, while a utility box may be counted as one site per side, regardless of the square footage. In the case of graffiti spread over larger objects like bridges or walls, it may be classified as one site if close together or multiple sites if widely spaced. Personnel performing the remediation manually enter the number of sites into Accela.

Finally, two reports, namely the "Graffiti Abatement Detail Scorecard" and the "Graffiti Abatement Program Summary Scorecard," were tested for accuracy for June 1, 2023. These reports displayed significant discrepancies for that single day. The detail scorecard showed slightly more than half the cases of the summary report but nearly twice the square footage remediated. We compared the number of graffiti cases in Accela for each of the reports and identified discrepancies. The detail scorecard reported 106 cases closed and the summary scorecard identified 205 cases closed, while we identified more than 310 cases closed. These inaccuracies prompted us to report the issue to DSD, leading to their investigation, identification of errors, and submission of Remedy Tickets to correct the Accela report coding.

Additionally, we discovered basic mathematical errors in the totals of inspections in the "Code Detail Weekly Report" and the "Code Summary Report All Field Units." The number of inspections in the "Code Detail Weekly Report" did not match those in the "Code Summary Report All Field Units" for the same field unit (the "NET" unit) for the same period (June 28-30, 2022). Furthermore, when we generated the code summary report for individual field units, summed them up, and compared them to the "Code Summary Report All Field Units," we identified discrepancies.

The absence of a clear definition for performance measures prior to engaging a contractor to write the reports, coupled with the contractor's failure to include comments in their report code for readability, has contributed to variations in the output. Consequently, calculation of performance measures was inaccurate during the scope period, and the definitions of these measures remain ambiguous at best.

[4] Oversized vehicles is a zoning violation. An example would be a recreational vehicle parked in a driveway for more than two weeks.
[5] ECCO was the system used prior to Accela.

Recommendations

The Director of DSD should:

- Overhaul its code enforcement and graffiti SOPs, eliminating references to systems that are no longer used, streamlining the information so that it is presented in a logical, sequential manner, is not repetitive, and reflects actual workflows.
- Ensure there is only one definition of each performance measure, including:
  - An objective definition for each measure (as opposed to being open to interpretation/subjective).
  - The population on which each measure is based.
  - The calculation methodology for each measure.
- Ensure the tier levels have consistent attributes for all violations in that tier (e.g., every violation in the same tier will have the same initial inspection and resolution time frames).

C. Consent Forms to Enter Premises

Code Enforcement personnel have not been obtaining written consent to enter an owner's or tenant's property.

We sampled 10 inspections in which personnel entered private premises. There was no evidence in Accela of a consent form or warrant issued for any of the 10 inspections. When we requested such evidence from DSD, they were unable to provide it.

DSD SOP 629.04 states, "Always get consent in writing using the approved form (DSDCode0061-rev02212014). A person can always retract and state that consent was never given, and the officer entered illegally."

Personnel reported to us that they believe that verbal consent is adequate. Moreover, as previously mentioned, they do not utilize Accela as the official system of record. Consent forms, if used, were scattered in different places, making it challenging to locate them.

Recommendation

The DSD Director should update Code Enforcement SOPs to be consistent with the legal requirements for right of entry that clearly states that verbal consent is permitted and sufficient to legally enter private premises. DSD should coordinate with the City Attorney's Office on the correct language and ensure that Code Officers put notes in the Accela System about the details of the verbal consent.

D. Billing of Property Owners

Under current billing practices, owners may not be aware that they owe money to the City.

Currently, the billing process is set up so that owners get at most two notices: the initial bill and one late payment reminder. During our testing, we were shown an account in which the owners paid slightly less than the total amount due. This resulted in a remaining balance of a little more than four dollars. Since the owners have not received any further bills, interest will continue to accumulate on this balance until the property changes hands.

Recommendation

The DSD Director should work with Finance to require a bill be provided to the payee noting any outstanding balances or full payment rendered any time a payment is received.

E. Sharing of Accela Accounts

New Graffiti personnel have been using another employee's Accela account rather than their own during their training period.

This practice may have helped the Graffiti Unit ensure all personnel who worked a site were appropriately credited for that work, however it violates City policy. City Administrative Directive 7.4a prohibits employees from sharing passwords with anyone and prohibits the use of a City account by others.

Recommendation

The DSD Director should ensure that each person has their own login to Accela including trainees.

Appendix A – Staff Acknowledgement

Mark Bigler, CPA-Utah, CISA, CFE, Audit Manager
Susan Van Hoozer, CISA, CIA, Auditor in Charge
Javier Castillo, IT Auditor

Appendix B – Management Response

CITY OF SAN ANTONIO

SAN ANTONIO TEXAS 78283-3966

February 5, 2024

Kevin W. Barthold, CPA, CIA, CISA
City Auditor
San Antonio, Texas

RE: Management's Corrective Action Plan for Audit of Development Services Department – Code Enforcement

The Development Services Department (DSD) has reviewed the audit report and has developed the Corrective Action Plan below corresponding to the report recommendation.

Appendix B – Management Response (cont.)

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
A	**Use of Accela** The DSD Director should: 1. Require DSD personnel to use Accela as the system of record (except when law requires hardcopies to also be kept) so that all documentation related to complaints, inspections, work orders, and cases is in one location. This includes: 1) documenting field notes in Accela; 2) taking photos as required by SOPs and placing all of them in Accela; 3) placing scans of all relevant documents in Accela; 4) documenting supervisory/managerial approvals in Accela; and 5) entering in Accela the results of court cases and hearings, including fines levied. 2. Update SOPs to specify: 1) which fields in Accela are mandatory to use; 2) where each type of documentation is to be stored; and 3) that Accela is to be used as the official system to manage Code Enforcement workflow (see also Issue B). 3. Implement the ability to cancel a work order in Accela	8	ACCEPT	1. Amin Tohmaz 2. Danny Liguez 3. Patricia Cavazos	1. Completed 01/04/2024 2. Completed 01/16/24 3. Completed 12/10/2023
	Action plan: The Development Services Department (DSD) has updated all Code Enforcement SOPs to reflect the recommendations and findings stated above, including the requirement for staff to use Accela as the only system of record for all complaints, inspections, work orders, and cases within Accela. Additionally, the updated SOPs clarify to staff which fields in Accela are mandatory to use, where each type of documentation is to be stored, and that Accela is to be used as the official system to manage Code Enforcement workflow. DSD trained Code Officers on all updated procedures on January 3 & 4, 2024. Finally, the ability to cancel a work order within Accela was implemented on December 10, 2023.				

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Appendix B – Management Response (cont.)

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
B	**Performance Measures and SOPs** The Director of DSD should: 1. Overhaul its code enforcement and graffiti SOPs, eliminating references to systems that are no longer used, streamlining the information so that it is presented in a logical, sequential manner, is not repetitive, and reflects actual workflows. 2. Ensure there is only one definition of each performance measure, including: a. An objective definition for each measure (as opposed to being open to interpretation/subjective). b. The population on which each measure is based. c. The calculation methodology for each measure. 3. Ensure the tier levels have consistent attributes for all violations in that tier (e.g., every violation in the same tier will have the same initial inspection and resolution time frames).	11	ACCEPT	1. Danny Liguez 2. Amin Tohmaz 3. Amin Tohmaz	1. Completed 01/31/2024 2. Completed 01/31/2024 3. Estimated completion April 2025
	Action plan: The DSD has updated all Code Enforcement and Graffiti SOPs to reflect the recommendations and findings stated above, to include eliminating references to systems that are no longer used, streamlined the workflow in a logical manner, and communicated the performance measures and definitions to staff. This includes updating the definitions of each performance measure – particularly in relation to the graffiti abatement and sites abated. The tier levels of violations will be addressed/updated through the development of the Code Enforcement Strategic Plan, estimated to be completed in FY25. The DSD Code Enforcement Strategic Plan project was initiated via a City Council Consideration Request last year and will include a community informed, multi-phase plan for Code Enforcement moving forward. The plan will include a reevaluation of all SOPs to align with new goals, priorities and performance metrics for the Code Enforcement Division.				

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Appendix B – Management Response (cont.)

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
C	**Consent Forms to Enter Premises** The DSD Director should update Code Enforcement SOPs to be consistent with the legal requirements for right of entry that clearly states that verbal consent is permitted and sufficient to legally enter private premises. DSD should coordinate with the City Attorney's Office on the correct language and ensure that Code Officers put notes in the Accela System about the details of the verbal consent.	11	ACCEPT	Danny Liguez	Completed 11/22/2023
	Action plan: The DSD has updated all Code Enforcement SOPs, including SOP 629 "Right of Entry", to reflect the recommendations and findings stated above, specifically to include consistent language on legal requirements for right of entry.				
D	**Billing of Property Owners** The DSD Director should work with Finance to require a bill be provided to the payee noting any outstanding balances or full payment rendered any time a payment is received.	12	ACCEPT	Veronica Castro	Estimated completion April 2024
	Action plan: The DSD Fiscal team is working with ITSD to create an Accounts Receivable Aging Report to identify customers with outstanding balances and mailout a balance statement to customers. The DSD Fiscal team will review the report on a monthly basis and address outstanding balances with customers as needed.				
E	**Sharing of Accela Accounts** The DSD Director should ensure that each person has their own login to Accela including trainees.	12	ACCEPT	Amin Tohmaz	Completed 01/04/2024
	Action plan: The DSD conducted training with all Code Enforcement and Graffiti abatement staff on the requirements that each person uses their own login when using Accela. This included training on City Administrative Directive 7.4A *"Acceptable Use of Information Technology"* which prohibits employees from sharing passwords with anyone and prohibits the use of a City account by others. DSD has also added this for all new employee orientation training.				

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Appendix B – Management Response (cont.)

We are committed to addressing the recommendations in the audit report and the plan of action presented above.

Sincerely,

Michael Shannon
Director
Development Services Department

2/5/24
Date

Roderick Sanchez
Assistant City Manager
City Manager's Office

2/6/2024
Date

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