

**Code Compliance Process Audit  
December 2014**

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## City Auditor's Office

December 15, 2014

Honorable Mayor and Members of the City Council:

I am pleased to present the Code Compliance Process Audit Report. The purpose of the audit was to evaluate the effectiveness and efficiency of the City's Code Compliance process, and to conclude as to the reliability of data needed to adequately prioritize, track and manage code compliance complaints.

Management's response to our audit findings and recommendations, as well as target implementation dates and responsibilities, are included following the report.

We would like to thank staff from the Code Compliance Services Department for their full cooperation and assistance during the project.

*Lori Brooks*

Lori Brooks, CPA, CIA, CGAP, CRMA  
City Auditor

Attachment

c: Trey Yelverton, City Manager  
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## *Executive Summary*

The City Auditor's Office has completed an audit of the Code Compliance Process. The audit was conducted 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. The audit objectives were to evaluate the effectiveness and efficiency of the City's Code Compliance process and to conclude as to the reliability of data to adequately prioritize, track and manage code compliance complaints.

The City Auditor's Office noted the following:

- Complaints received through the Code Ranger program result in a 70-80% violation rate and are normally inspected within 48 hours of receipt.
- Approximately 90-95% of Graffiti abatements are performed by the City within 48 hours of receipt. Abatement consent forms are obtained from the homeowner.
- Dangerous and Substandard Structure (DSS) cases are properly documented with all information required by state law and by Code Compliance policy.
- Inspections in the Neighborhood Revitalization Strategy Area (NRSA) appear to be in compliance with the CDBG Grant requirements. In addition, inspection activities, as well as expenditures, are properly monitored by Grants Management personnel.
- Abatement contracts are adequately monitored. Invoices are accurately billed by the vendor and are paid in a timely manner.
- The general processing/resolution of complaints appear to be adequate. Citizen complaints are properly documented within the AMANDA system (a web-based licensing, permitting, inspection, complaint and financial processing software).

Opportunities for improvement include the following:

- Approximately 39% of all nuisance complaints have a final status of "No Violation Found." Code Compliance Officers' time could be spent in a more effective and efficient manner.
- Nuisance complaints are not routinely inspected in a timely manner.

Details of audit findings, conclusions and recommendations are included in the following report.

## ***Audit Scope and Methodology***

The audit was conducted in accordance with generally accepted government auditing standards. The following methodology was used in completing the audit.

- Interviewed personnel responsible for various activities of Code Enforcement
- Reviewed operational processes in place for the activities selected for this audit
- Reviewed information within the AMANDA, Catalyst (accounts payable processing) and Lawson (financial accounting) systems
- Reviewed Code Enforcement policies and procedures
- Reviewed City Ordinances and State Regulations related to Code Enforcement
- Tested numerous case folders for processing and final status of complaints
- Surveyed Texas cities to determine how they provide specific Code Enforcement activities

## ***Background***

The mission of Code Compliance Services is “to engage, protect and encourage the citizens of the City of Arlington.” To accomplish this mission, Code Compliance Services will: 1) **Engage** communities and promote responsible home ownership; 2) **Protect** and invest in the vision of the neighborhoods; and 3) **Encourage** responsible pet ownership and provide for the humane care of stray and unwanted animals.” This audit concentrated on the first two aspects of this mission statement.

The areas within Code Compliance that were addressed include:

- Code Ranger Program
- Graffiti Abatement
- Dangerous and Substandard Structures (DSS)
- Multi-Family/Extended-Stay Annual Property Inspections (API)
- City of Arlington Neighborhood Revitalization Strategy Area (NRSA)
- Active abatement contracts used in Code Compliance
- General complaint processing and resolution.

Below is a brief description of each of these areas.

### Code Ranger Program

The Code Ranger Program is housed at the East Police Station under the direct supervision of the East Field Operations Manager (FOM). This program consists of citizens who are trained by Code Enforcement personnel to understand, identify and report code violations. Within AMANDA, when a complaint is entered as a result of a Code Ranger activity, the system automatically sends the complaint to the East FOM’s queue. Once the complaint is received, it is reviewed by the East FOM and distributed to the Code Compliance Officer (CCO), and the supervisor within the district where the complaint originated. The East FOM tracks the number of Code Ranger complaints that are received and also tracks whether each complaint was an actual violation or not a violation.

Per policy, Code Ranger complaints are to be inspected within 48 hours. The timing of the inspection is the responsibility of the CCO to which the complaint is assigned. After the inspection is performed and the result is input into AMANDA, the system automatically sends the originating Code Ranger an email stating that there was, or was not, a violation.

Currently, there are 345 Code Rangers in Arlington. To become a Code Ranger, a person must attend a training session that identifies and discusses the ten most common code violations in Arlington. According to staff, around 70-80% of Code Ranger complaints result in actual violations.

### Graffiti Abatement

The Graffiti Abatement Program is housed at the West Police Station under the direct supervision of the West Field Operations Manager. Graffiti complaints may be obtained from many different sources, including Code Rangers, citizens, City departments, and proactively by other CCOs. The graffiti abatement program is only responsible for graffiti on private property. Graffiti on City property/buildings is handled by the Public Works & Transportation Department, and graffiti found in parks is handled by the Parks and Recreation Department.

When a graffiti complaint is received, the first consideration is whether a *Graffiti Consent to Remove Form* is on file for the owner of the property. If the form is not on file, the CCO within that district will contact the owner to obtain a signed form. If a signed form is already on file, the district CCO takes no action. Once there is a signed form on file, it is attached to the property account and the complaint is automatically sent (by AMANDA) to the Community Services Technician in the West District. The Community Services Technician is responsible for city-wide abatements and attempts to abate graffiti complaints within 24 hours. There are times when other CCOs may abate graffiti. For example, if the graffiti is on a utility box, any CCO may paint over the graffiti. Code Compliance has a blanket waiver from the utility companies, and all CCOs carry paint in their vehicles.

If no consent form is on file and/or the property owner refuses to sign the form, the complaint will be handled through the normal Notice of Violation process. A notice will be given to the owner, and a citation will be issued. If the owner has not signed a consent form or removed the graffiti within twenty-six days after the initial notice is given, a warrant will be issued. The graffiti will then be abated by the City, and the owner will be sent a bill for actual costs and administrative fees. According to the West FOM, approximately 98% of graffiti is abated by the City with a consent form on file.

### Dangerous and Substandard Structures (DSS)

The DSS Program is housed at the East Police Station under the direct supervision of the East Field Operations Manager. This program also includes two inspectors located in the City Office Tower. The East FOM must divide his time between the two locations, in order to properly supervise the program.

Normally, DSS cases are initially identified by other CCOs in the field while conducting their daily workload schedule, and a notice and/or citation is issued. If the citations are of a serious nature (life-safety issues) and are not resolved by the owner, then the location could be referred to the DSS

group. The DSS inspector performs an exterior inspection of the structure. If the property qualifies for the DSS program, the owner is sent a notice requesting an interior inspection. Once the interior inspection is completed, a process begins where either the owner renovates the premises to comply with City Code, or the City proceeds with steps to demolish and remove the property.

If the owner decides to complete the renovations himself, he must provide a *Scope of Work* document from the contractor detailing the work to be completed. Also, a written progress report must be submitted each month during the renovation. The DSS inspector will observe the site to ensure the work is being performed adequately.

If the owner decides not to renovate the premises, then the City begins preparing for a court hearing. One step in this process is to obtain an appraisal of the property. In addition, a list of all interested parties (owners, mortgage holders, etc.) must be obtained through the use of a title search. All interested parties must be notified of the hearing. The Hearing Notice must include a description of the property, a list of all interested parties, and a list of all violations observed. This notice is sent by both regular and registered mail to each interested party. Photographs of the violations must be presented at the hearing. Once the hearing is completed and a final judgment is obtained, each interested party must be notified of the judgment (posting notification at the property and via registered/regular mail). The demolition and removal contractor is then notified to abate the property.

The DSS Manager and inspectors can usually complete 50 residential DSS cases per year. They normally have 20 – 25 active cases open at any given time.

#### Multi-Family/Extended-Stay Annual Property Inspection (API)

The Multi-Family/Extended-Stay API Program is housed at the City Office Tower under the direct supervision of the North Field Operations Manager and the Multi-Family Supervisor.

Prior to fiscal year 2013, all CCOs were required to perform inspections. However, the current program includes only four inspectors. Based on historical data, the Code Compliance Department identified the 25 facilities having the most violations in Arlington. One inspector is responsible for these facilities. The rest of the city is divided between the other three inspectors (South, East/Central and North).

The inspector sends the owner a one month advance notice of an inspection appointment. The owner then has time to prepare for the inspection and pay any API fees that are due. If fees have not been paid, the CCO will issue a Notice of Violation. Upon completion of the inspection, any violations are given to the owner. Life safety issues must be cleared within 24 hours. Other violations are to be cleared within 30 days. The initial inspection and the first re-inspection of the facility are performed at no additional costs to the owner. If violations are not cleared, and additional re-inspections are required, the owner will be required to pay \$200 each for the additional inspections. According to management, approximately 70% of violations are cleared, and fees are paid, within the 30-day period. Following the second re-inspection, however, if all violations are not cleared, the CCO may issue citations upon management approval. Once violations are cleared and fees are paid, the facility is issued a license to operate, which is now required by City Ordinance.

In January 2014, the inspectors began using the InspectCheck software on their iPads to perform inspections in the field. This software, used exclusively for multi-family and extended-stay inspections, includes the Housing & Urban Development's (HUD) Uniform Physical Conditions Standards (UPCS) standardized inspection process for APIs. This process gives a more accurate scoring of the facility. In addition, the CCO can attach voice notes and add pictures of violations to the inspection record. Once the inspection is completed, the CCO can immediately prepare a report; and the owner can sign on the iPad documenting his review of the report. According to management, this new process has reduced the inspection time by one-half. As of June 2014, all multi-family facilities were included in this new system. Once all multi-family and extended-stay facilities are in the InspectCheck system, they expect a 95% payment rate for the API fees.

The semi-annual API billing process is managed within the AMANDA system. Multi-family facilities are billed at a rate of \$6.90 per unit, while extended-stay facilities are billed at a rate of \$43.02 per unit. Accounting Aides in the Finance Department prepare and send the billings. Upon receipt, customer payments are processed and entered into the Lawson Accounting system by Accounting Clerks. A list of payments is then sent to the aides in order to post the payments in AMANDA. The inspectors can then see if payments have been made.

Since this area of Code Enforcement was tested extensively during a previous audit (report issued in August 2011) and the subsequent Follow-Up audit (report issued in October 2012), additional testing and field work was not performed.

#### Neighborhood Revitalization Strategy Area (NRSA) Program

The NRSA Program is housed at the City Office Tower under the direct supervision of the North Field Operations Manager.

The NRSA is basically a concentrated area with extensive code enforcement activity. The general area covered by the NRSA is from Abram Street to Randol Mill Road (north/south) and from Collins Street to Crowley Road (east/west). Two CCOs are responsible for this area. They perform routine code inspections and issue notices and citations, when necessary. As part of their community outreach component, they attend community events and hand out code-related informational fliers to residents. Within the NRSA, there are 59 multi-family complexes, which include about 2,600 units along with 20 pools, and 1,400 duplexes that are all subject to the Code API requirements. Also included are many commercial properties. At this time, the NRSA CCOs do not perform APIs, as they are performed by one of the CCOs within the Multi-Family Inspection group, as noted earlier.

Funding for the NRSA program is provided at an amount of \$119,778 per year by the Community Development Block Grant (CDBG). The program year runs from July 1 through June 30.

#### Abatement Contracts

Abatement contracts are under the direct supervision of the South Field Operations Manager, whose office is located at the South Police Station.

Currently, there are five contracts relating to abatement activities. They include securing (unoccupied buildings/homes), mowing, tree trimming, locksmith services and demolition/removal services. The securing contract includes abatements for unclean premises, stagnant/foul water,



dilapidated fencing, etc. Tree trimming abatements are currently being performed through a Parks and Recreation Department contract.

### Complaint Processing & Resolution

When a complaint is first received by the City (either by phone, email, website, etc.), it is entered into the AMANDA software system. The system automatically identifies the location of the complaint and distributes the information to the appropriate CCO within that district. Depending on the type of call, the CCO may inspect the complaint the same day or possibly within three days. For example, a life-safety complaint is required to be inspected the same day or within 24 hours; complaints initiated by Code Rangers are required to be inspected within 48 hours; and other complaints (high weeds/grass, unclean premises, parking in yard, etc.) should be inspected within three business days. Re-inspections are performed within seven to ten days of the initial inspection.

Each CCO receives a workload report each morning that lists the complaints assigned to him/her for that day. The CCO also has a task list that includes complaints from the previous day/days that were not completed. Complaints remain on the task list until they are completed. Regardless of time needed to complete a task, the CCO will work all items on the lists. The CCO performs as many inspections as possible during the day (goal to complete at least 25/day). All information related to inspections is recorded in AMANDA.

When abatement is necessary for high weeds/grass, unclean premises or tree trimming, a warrant is required. When a Notice of Violation has been posted and citations have been issued for a specific complaint, and the owner does not comply; then Code Compliance can prepare a warrant, abate the problem, and bill the resident. The warrants are prepared by South District CCOs, signed by the judge, and sent to the contractor. At the time the contractor is ready to abate the problem, a CCO must be present, as an official of the City, when the warrant is presented to the property owner. In most cases, weed/grass cases are mowed the next day after the warrant is obtained. Unclean premises and tree trimming abatements are usually cleared within a week. Securing of unoccupied/vacant buildings is usually performed within 24 hours. After the abatement is completed, the CCO observes the site to ensure appropriate completion of the work, and records the final resolution in AMANDA.

Invoices for contractor abatements are processed by Finance Department Accounting Aides. A copy of each invoice is sent to the South FOM who is responsible for abatement contracts. When an invoice is received, the Accounting Aide reviews information in AMANDA to ensure the abatement was adequately completed (final inspection noted by the CCO). Once the abatements are verified, the invoice is paid through the Catalyst system.

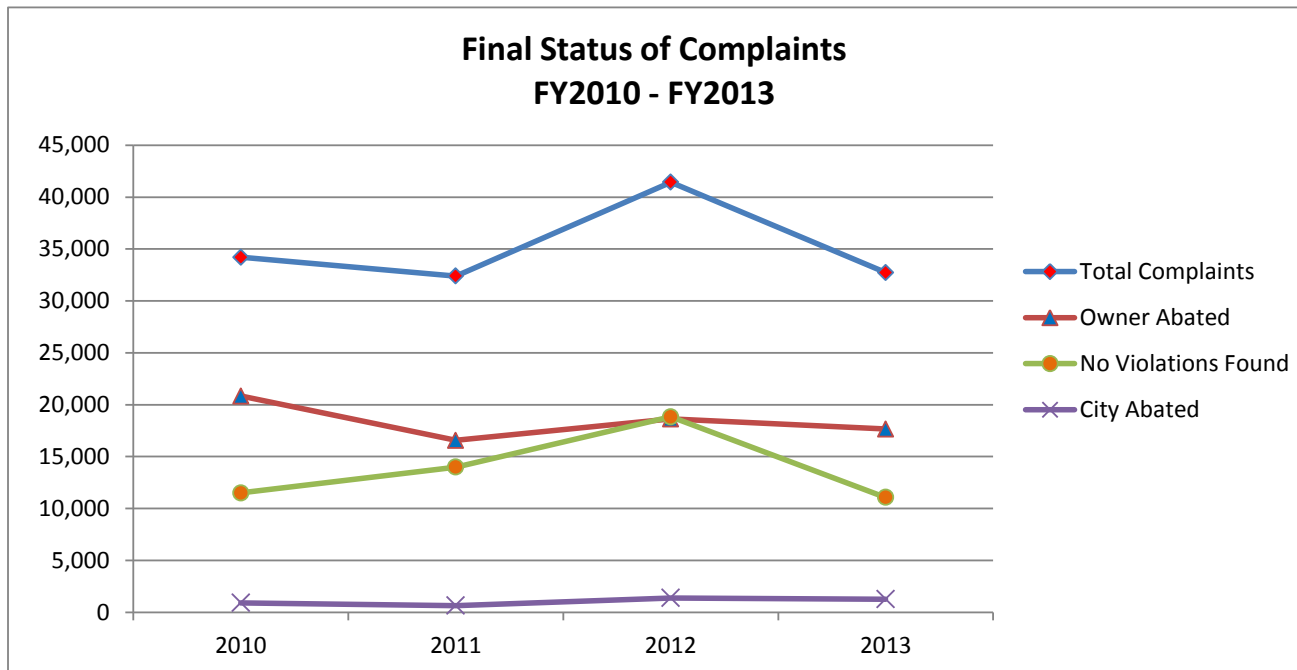
## ***Audit Results***

### Complaint Status

When a complaint record is closed by the CCO, the status is recorded in AMANDA. The three most common entries are: 1) owner abated; 2) no violation found; and 3) City abated.

With regard to the “Owner Abated” status code, there are times when the complaint is filed, the property is inspected and a Notice of Violation (NOV) is issued; however, prior to the CCO returning to re-inspect the property, the owner has already resolved the problem. Therefore, “Owner Abated” status is entered. For the “No Violation Found” status, a complaint is filed by a citizen and before the CCO arrives to perform the initial inspection, the owner has already resolved the problem; therefore, no violation is observed. For those owners that do not respond to the notice or subsequent citations, the City abates the violation and charges the homeowner for the related cost.

As shown in the following chart, a large percentage of complaints are either abated by the owner or no violation is found. During the 4-year period shown below, approximately 50% of complaints were owner-abated and about 40% resulted in no violation found. Only about 3% were abated by the City.



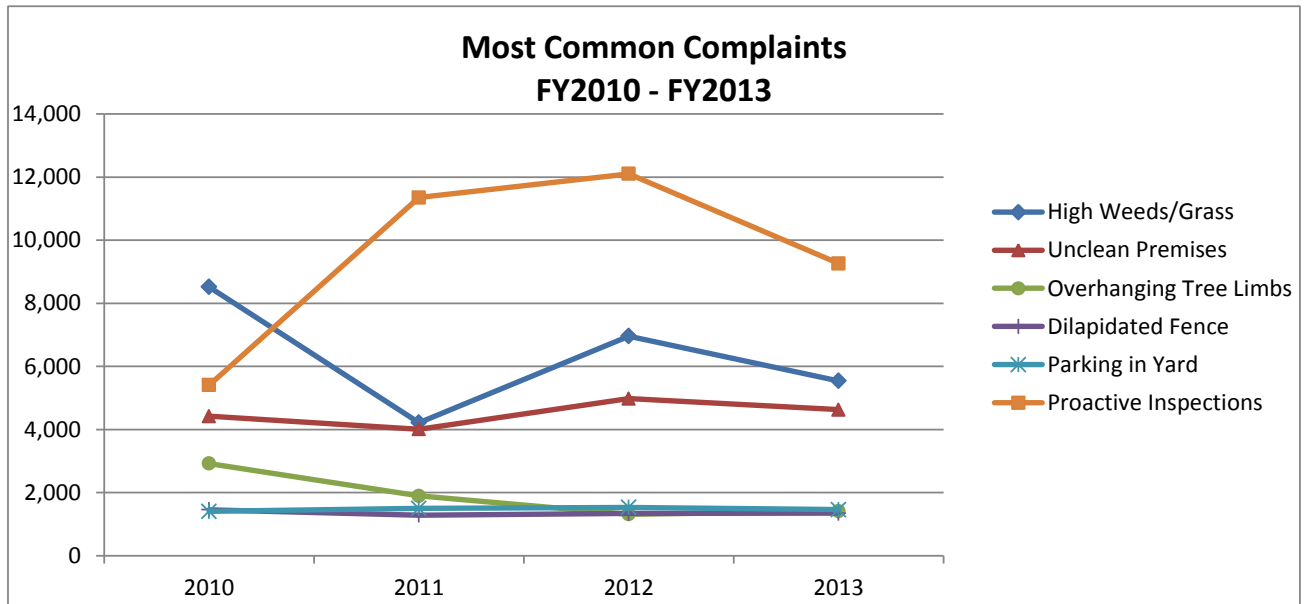
Source: AMANDA

### Most Common Complaints

Code Compliance performs regular Proactive Inspections, which are not initiated by a complaint. These are violations identified by Code Officers while in the field, which are addressed at that time. In addition, Code Compliance performs proactive “sweep” inspections, which are initiated by a complainant related to an area (neighborhood) with multiple potential violations. During proactive sweeps, the Code Officer inspects every house in the area for possible violations. When combined,

these proactive inspections represent about 31% of the total activities for FY2011 – FY2013 (began tracking in 2011).

During the period of FY2010 – FY2013, the following includes the five most common complaints and their corresponding percent of total complaints filed: high weeds and grass (17.1%); unclean premises (13.9%); overhanging tree limbs (6.0%); dilapidated fences (4.7%); and parking in yards (4.3%). The total of these inspections, along with proactive inspections, represents over 75% of all inspection activities performed. The chart below illustrates the annual totals for these inspections.



Source: AMANDA

During preliminary testing, the following was noted for the specific areas reviewed during this audit:

#### Code Ranger Program

According to management, about 70–80% of complaints initiated through the Code Ranger Program result in violations. Preliminary audit testing of these complaints (from 10/1/13 through 5/31/14) indicated 76% resulted in violations issued (238 of 314). In addition, the testing indicated that Code Ranger complaints are primarily inspected within 48 hours, as required by policy, which increases the likelihood of a violation being issued. One deficiency, however, was noted during testing. Not all Code Ranger complainants received an email advising them of the status of their complaint (9 of 30 reviewed). *Management has been advised of this deficiency.*

#### Graffiti Abatement

During FY2014 (as of 5/31/14), a total of 239 graffiti complaints were reported. Of those complaints, 25 were selected for preliminary testing. During the review, it was noted that all of the homeowners had signed a Graffiti Removal Waiver; therefore, the abatements were performed at no cost to the homeowner. In addition, 23 of 25 (92%) of the abatements reviewed were performed the same day or within 48 hours.

One abatement technician spends about 50% of his time performing city-wide graffiti abatements, while the remainder of his time is spent on other Code Enforcement activities. He abates an average of 10-12 graffiti complaints per week.

#### Dangerous and Substandard Structures (DSS)

During FY2013 and FY2014, there were 45 DSS cases closed by Code Enforcement. Of those cases, 6 were selected for review. During the review, it was noted that all required information was retained within the case file. Required information includes:

- Appropriate measures used to identify all interested parties to the case
- Notification of all interested parties at least 10 days prior to the DSS hearing
  - ✚ All required information was included within the hearing notification
- Notification of all interested parties within 10 days of the final judgment.

In addition to the stated required information, other information was retained within the case file, as well. Other documentation included property appraisal, title search, warranty deeds, fire reports when necessary, copy of demolition invoice, copy of inspection reports including pictures, progress reports and pictures, if restoring the residence, and other necessary legal documents. Case files were found to be very well documented.

#### Neighborhood Revitalization Strategy Area (NRSA)

As of 6/9/14, the NRSA Code Compliance Officers had inspected 2,271 complaints (1,305 unduplicated addresses) and issued 1,796 violations during FY2014. Of those violations, a total of 1,687 (94%) had been abated either by the owner or by the City. Twenty-one percent (21%) resulted in a “No Violation Found” status, which is much lower than the 35-40% for city-wide complaints.

Since this program is grant funded, all NRSA activities are being monitored by the Grants Management division within the Community Development and Planning (CD&P) Department. All NRSA related expenditures, including payroll, and inspection activities, are reviewed on a regular basis. Audit’s review showed expenditures are being properly posted in the Lawson accounting system, and proper reporting is being prepared for NRSA activities. In addition, adequate documentation of inspections is being maintained within the AMANDA system.

#### Abatement Contracts

For FY2014, vendor invoices were reviewed, along with documentation within AMANDA, to ensure accuracy.

Vendors used for abatements during the period under review include:

- Prather Contracting (securing) - 112 invoices, 13 selected for review
- T. Smith’s Lawn Services (mowing) - 14 invoices, 3 selected for review
- Northeast Services (tree trimming) - 10 invoices, 6 selected for review
- Lock Tight Security (locksmith) - 11 invoices, 3 selected for review
- Intercon Environmental (demolition/removal) - 3 invoices, 2 selected for review

The City Auditor's Office did not observe any exceptions during this review. For each of the invoices reviewed, the following items were noted:

- Invoices were calculated accurately based on the contract pricing sheet
- Invoices were properly approved
- AMANDA folders contained adequate documentation to validate the work performed
- Invoices were paid in a timely manner
- Property owners were billed for abatement costs plus administrative fees in a timely manner
- Necessary documents (i.e. notices of violation, abatement placards, abatement letters, abatement warrants, etc.) were posted and/or mailed to the property owners prior to abatement.

#### Complaint Processing/Resolution

During this audit, the City Auditor's Office reviewed the general processing and resolution of Code complaints. A sample of 50 complaints, entered during the months of April and May 2014, were selected for testing.

Twenty-two (22) of the 50 complaints (44%) selected for review resulted in a "No Violation Found" status. For 12 of these 22 complaints, the initial inspection of the property was performed 5 – 20 days after the complaint was received. The excessive passing of time after a complaint is received gives the property owner ample time to resolve the issue prior to inspection. The other 10 sampled complaints were inspected the same day or within 3 days, as stated in the policy. The number of "No Violation Found" inspections seems to indicate that either the property owner just happened to abate the problem prior to the inspection, or the complaint was not an actual violation according to City Code. In either case, complaints that result in "No Violation Found" status appear to be excessive and result in inefficient use of the CCO's time. Therefore, this process was reviewed in more detail. According to Code Compliance management, there were seven new CCOs that began working in the field in January 2014, which could have contributed to some of the delays.

No deficiencies were noted for the remaining 28 of 50 complaints reviewed, relating to processing or final disposition.

## *Detailed Audit Findings*

### **1. Lack of Timely Initial Inspection Results in Excessive Complaints with “No Violation Found” Final Status**

General Code Compliance policy is to inspect complaints within 3 days of receipt (with the exception of life-safety issues and Code Ranger calls, which require same day and within 48 hours, respectively). In addition, it is required that the final status of each inspection be entered into the AMANDA system. The most common final status codes include:

- Owner Abated
- City Abated
- CCO Abated
- No Violation Found

Over a five year period (FY2010 – FY2014), the two most prevalent status codes were “Owner Abated” (average 52%) and “No Violation Found” (average 39%) for the Code complaints received.

During this same 5-year time period, all “No Violation Found” complaints (62,549 of 160,482 total complaints, 39%) were reviewed to determine the time frame in which they were initially inspected following receipt of the complaint. Approximately 62% (38,484 of 62,549) of the complaints resulting in “No Violation Found” were inspected within 3 days. The following are examples of specific types of complaints (with the most “No Violation Found” final status) and the average percentage inspected within 3 days:

- High Weeds/Grass – 50%
- Unclean Premises – 44%
- Dilapidated Fence – 49%
- Nuisance Vehicle – 45%
- Parking in Yard – 41%.

In contrast, complaints for which a specific action was taken (Notice of Violation issued, Citation issued, door placard placed, or monitored site) were also reviewed. In FY2013, for complaints where an action was taken by the CCO, 90% of the initial inspections were performed within 3 days of the complaint being received. In FY2014 (through June), 85% of the time the inspection was performed within the 3-day period. Therefore, based on the previous information, there appears to be a definite correlation between complaints having a final status of “No Violation Found” and the lapse of time between receipt of the complaint and the initial inspection.

“No Violation Found” is a legitimate inspection outcome, due to: 1) citizens abating the problem prior to the inspection, and 2) citizens initially reporting complaints that are not actual code violations. However, in order to provide services in an effective and efficient manner and maximize department resources, activities resulting in “No Violation Found” final status

should be minimal. Code Compliance management may consider expanding the services provided through the Code Ranger Program. For example, if a complaint has not been inspected within a certain time period after receipt (time established by management), perhaps a Code Ranger could perform a drive-by inspection. The inspection would include only a visual observation of the premises (no contact with the owner). The Code Ranger would then report to the CCO in that district whether a violation is, or is not, present. Such a program could eliminate some of the current activities related to “No Violation Found” final status calls, and allow the Code Compliance Officers the opportunity to more efficiently provide needed services within their assigned districts.

***Recommendations:***

- 1. The City Auditor’s Office recommends that the Assistant Director over the Code Compliance Services Department evaluate the feasibility of establishing a program whereby Code Rangers are further utilized to observe specific open complaints. Such a program may reduce the number of cases that Code Compliance Officers must physically observe; thereby, improving the efficiency and effectiveness of the department.***
- 2. The City Auditor’s Office recommends that the Assistant Director over the Code Compliance Services Department ensure nuisance complaints are inspected in a timely manner.***

**CITY OF ARLINGTON  
CODE COMPLIANCE PROCESS  
MANAGEMENT RESPONSE AND ACTION PLAN**

AUDIT RECOMMENDATION	CONCUR/DO NOT CONCUR	MANAGEMENT'S RESPONSE	RESPONSIBLE PARTY	DUE DATE
<p><i>1. The City Auditor's Office recommends that the Assistant Director over the Code Compliance Services Department evaluate the feasibility of establishing a program whereby Code Rangers are further utilized to observe specific open complaints. Such a program may reduce the number of cases that Code Compliance Officers must physically observe; thereby, improving the efficiency and effectiveness of the department.</i></p>	Concur	Management is currently in the process of determining the feasibility of expanding assigned tasks and activities of citizens, who participate in the Code Ranger program. This project is identified as a FY15 Business Plan item.	East Field Operations Manager	3/2015
<p><i>2. The City Auditor's Office recommends that the Assistant Director over the Code Compliance Services Department ensure nuisance complaints are inspected in a timely manner.</i></p>	Concur	Management will continuously monitor workload data in order to ensure that the performance measure of conducting an initial investigation of a complaint occurs within three business days of receipt.	Assistant Director, Code Compliance Services	Ongoing