

**Performance Audit:  
Office of Code Compliance**

**June 2010**

**City Auditor's Office  
City of Atlanta**

**File #09.07**





## CITY OF ATLANTA

City Auditor's Office  
Leslie Ward, City Auditor  
404.330.6452

June 2010

### ***Why We Did This Audit***

We undertook this audit because City Council members and code compliance staff have expressed a need for additional inspectors; the city has reduced the number of inspectors since fiscal year 2008 due to budget shortfalls. At the same time, increases in foreclosures and absentee property owners have added to the perception that the code compliance workload has increased. Residents and elected officials have expressed concern about the lack of code compliance and rising number of vacant and abandoned structures in the city.

### ***What We Recommended***

The Commissioner of the Department of Planning and Community Development should:

- Develop procedures on data collection and quality assurance to ensure data on new complaints is complete and accurate.
- Develop measures and workload data that can be captured electronically in its normal work flows.
- Organize its file room for historical cases and any paper files created for new cases.
- Develop job expectations for inspectors and supervisors that require inspectors to enter inspection results promptly and accurately.

The mayor's office staff should:

- Develop quality assurance procedures for departments' ATLStat submissions.

For more information regarding this report, please contact Stephanie Jackson at 404.330.6678 or [sjackson@atlantaga.gov](mailto:sjackson@atlantaga.gov).

## ***Performance Audit:***

### **Office of Code Compliance**

#### ***What We Found***

The Office of Code Compliance lacks reliable data to prioritize, track, and manage its code compliance complaints, measure its progress toward meeting performance standards, or determine staffing requirements. The office also lacks written procedures for calculating and reporting workload and performance data. As a result, the office has publicly reported data that overstated its performance and misrepresented the makeup of its complaints. Reports underestimated the time it took to complete first inspections, over counted the number of highly hazardous complaints, and over counted the number of complaints generated externally. Two previous directors instructed staff to enter the last day of the month for complaints that had not been inspected, which made inspections appear to occur sooner than they actually did. These directors no longer work for the city. Due to resource constraints, mayor's office staff does not routinely verify the accuracy of ATLStat data.

A lack of written procedures for compiling both hardcopy and electronic data has contributed to incomplete and inaccurate data. We noted discrepancies between hardcopy and electronic files, including missing information and different re-inspection and compliance dates. The hardcopy files are disorganized and incomplete.

The new Accela case management system was intended to streamline data collection and case management. However, data problems remain, in part because of unresolved system problems that the office identified both before and after the system went live and in part because of procedural problems. City staff accepted Accela and the historical data migrated from KIVA without adequate testing. Complaint data migrated from KIVA or entered into Accela are not entirely reliable.

City Council members have expressed the need to add code compliance inspectors. However, without reliable data, management is unable to accurately assess its staffing needs. Going forward, Accela should be able to provide needed workload and performance data if the office develops clear requirements and quality control procedures for capturing and entering data into the system.

## Management Responses to Audit Recommendations

### Summary of DPCD Management Responses

**Recommendation #1:** **Develop procedures on data collection and quality assurance to ensure data for assigning, prioritizing, tracking, and reporting on new complaints is complete and accurate.**

**Response & Proposed Action:** The department is collaborating with the Office of the Mayor to complete a re-engineering process for the Office of Code Compliance. The re-engineering process includes but is not limited to establishing measurable performance outcomes; revising the Standard Operating Procedures to reflect current practices; and developing procedures to ensure the accuracy of performance and workflow data for the Office. **Agree**

**Timeframe:** Ongoing – Process should be complete and fully implemented by the first quarter of FY11.

**Recommendation #2:** **Develop measures and workload data that can be captured electronically in its normal work flows.**

**Response & Proposed Action:** The performance metrics for the Office are currently under development and are separated within the following categories: Overall Departmental Measures; Supervisor's Metrics; Inspector's Metrics; Research Metrics; and In Rem Metrics. Representatives from the Department of Information technology are designing reports that may be electronically generated through the Accela system. **Agree**

**Timeframe:** Ongoing – Process should be complete and fully implemented by the first quarter of FY11.

**Recommendation #3:** **Organize its file room for historical cases and any paper files created for new cases.**

**Response & Proposed Action:** The department will proceed with creating an organized and structural environment for the file room. **Agree**

**Timeframe:** Ongoing – Process should be complete and fully implemented by the first quarter of FY11.

**Recommendation #4:** **Develop job expectations for inspectors and supervisors that require inspectors to enter inspection results promptly and accurately.**

**Response & Proposed Action:** Prior to the release of the audit report, the requirement to enter inspection results promptly and accurately was established in April 2010. The department implemented a new process that is currently being monitored by the code enforcement supervisors. **Agree**

**Timeframe:** Ongoing

### Summary of Mayor's Office Management Responses

**Recommendation #5:** **Develop quality assurance procedures for departments' ATLStat submissions.**

**Response & Proposed Action:** The mayor's office staff plans to develop citywide quality assurance procedures for ATLStat submissions, and the Office of Code Compliance is the pilot project. **Agree**

**Timeframe:** December 31, 2010



# CITY OF ATLANTA

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**Ex-Officio Members:**  
Council President Ceasar Mitchell  
Mayor Kasim Reed

June 30, 2010

Honorable Mayor and Members of the City Council:

We initiated this audit because City Council members and code compliance staff have expressed a need for additional inspectors; the city has reduced the number of inspectors since fiscal year 2008 due to budget shortfalls. At the same time, increases in foreclosures and absentee property owners have added to the perception that the code compliance workload has increased. We focused our review on complaint data from fiscal year 2008 through January 2010.

We found the Office of Code Compliance lacks reliable data to prioritize, track, and manage its code compliance complaints, measure its progress toward meeting performance standards, or determine staffing requirements. As a result, the office has publicly reported data that overstated its performance and misrepresented the makeup of its complaints. Because this is the second program in which we have found problems with ATLStat data, we plan additional audit work on the reliability of performance data in other departments in our 2011 audit schedule.

Without reliable workload and performance data, management is unable to accurately assess its staffing needs. Going forward, Accela should be able to provide needed workload and performance data if the office develops clear requirements and quality control procedures for capturing and entering data into the system.

We provided a copy of the draft report to the department and mayor's staff on May 14, 2010, and met with them to discuss it on May 26, 2010. The Audit Committee has reviewed this report and is releasing it in accordance with Article 2, Chapter 6 of the City Charter. We appreciate the courtesy and cooperation of Code Compliance staff throughout the audit. The audit team for this project was Melissa Davis, Dawn Williams and Stephanie Jackson.

Handwritten signature of Leslie Ward in black ink.

Leslie Ward  
City Auditor

Handwritten signature of Fred Williams in black ink.

Fred Williams  
Audit Committee Chair



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# Office of Code Compliance

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# Introduction

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We conducted this performance audit of the Office of Code Compliance pursuant to Chapter 6 of the Atlanta City Charter, which establishes the City of Atlanta Audit Committee and the City Auditor's Office and outlines their primary duties. The Audit Committee reviewed our audit scope in April 2010.

A performance audit is an objective analysis of sufficient, appropriate evidence to assess the performance of an organization, program, activity, or function. Performance audits provide assurance or conclusions to help management and those charged with governance improve program performance and operations, reduce costs, facilitate decision-making and contribute to public accountability. Performance audits encompass a wide variety of objectives, including those related to assessing program effectiveness and results; economy and efficiency; internal controls; compliance with legal or other requirements; and objectives related to providing prospective analyses, guidance, or summary information.<sup>1</sup>

We undertook this audit because City Council members and code compliance staff have expressed a need for additional inspectors; the city has reduced the number of code inspectors since fiscal year 2008 due to budget shortfalls. At the same time, increases in foreclosures and absentee property owners have added to the perception that the code compliance workload has increased. Residents and elected officials have expressed concern about the lack of code compliance and rising number of vacant and abandoned structures in the city.

The mayor's office began reviewing the office's operations in March 2010. Mayor's office employees are implementing process changes intended to improve the quality of the complaint data and address the case backlog.

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<sup>1</sup>Comptroller General of the United States, *Government Auditing Standards*, Washington, DC: U.S. Government Accountability Office, 2007, p. 17-18.

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## Background

The Office of Code Compliance is one of four offices in the Department of Planning and Community Development, which also contains the offices of Buildings, Housing, and Planning. The office's mission is "to ensure safe and sanitary conditions in housing and commercial properties through effective code compliance efforts." The office inspects residential and commercial properties suspected of violating the Atlanta Housing Code, Zoning Code, Graffiti Ordinance, or Commercial Maintenance and Industrial Code. The bureau encourages property owners to voluntarily bring their properties into compliance when a violation is found, but an inspector can issue a citation when a property owner has not corrected a code violation. In some cases, the bureau can get court or administrative authority through the In Rem program to take direct action to correct a code violation. "In Rem" is a legal term that essentially describes a judgment against a property rather than against a person.

Cases are referred by citizens, code compliance inspectors, or other agencies. Citizens can initiate a code compliance case by telephone, fax, walk-in report, or through the city's website. Inspectors can also initiate a case based on field observations. Once the office receives a complaint, staff logs information into a work management system to prioritize and assign cases to inspectors. The office categorizes code violations as:

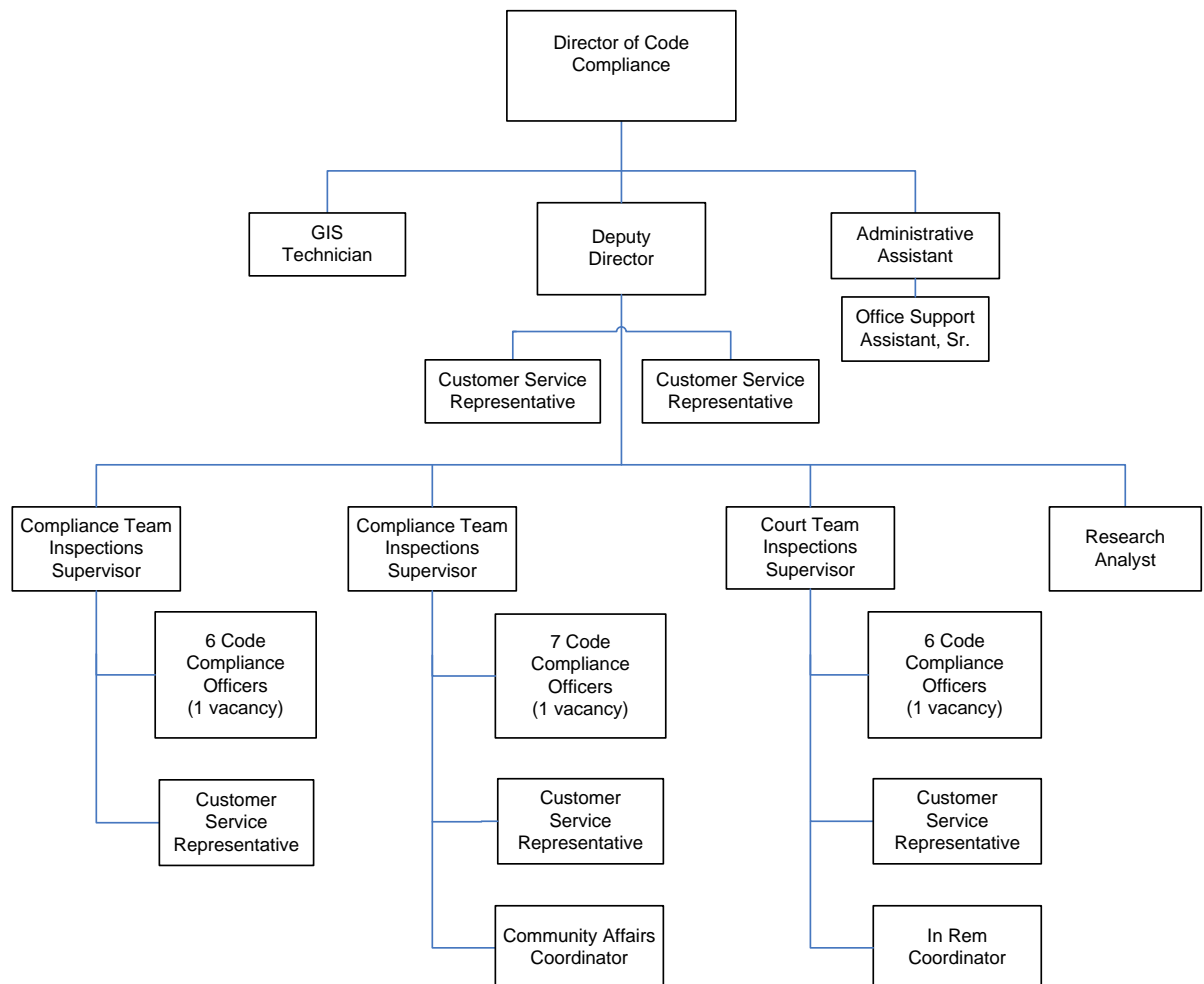
- highly hazardous, which include open and vacant properties, raw sewage, and properties without heat or water
- zoning, which include illegal rooming houses, parking in the yard, and illegal signs
- property maintenance, which include junk, trash, debris, junk vehicles, overgrowth, and structural deficiencies

According to the office's policies, highly hazardous and zoning complaints should be inspected within 48 hours of the time the complaint is received and property maintenance violations should be inspected within 5 to 10 days of the time the complaint is received, depending on the type of violation.

Cases are divided by legal status. Inspectors work in three teams, two compliance inspection teams and one court team (see Exhibit 1). The office created the separate court team in May 2009 to handle code compliance cases in the court system. The intent was

to decrease what the office characterized as a “front-end backlog” of inspections by reducing the amount of time that inspectors spent in court. Under the revised organizational structure, inspectors on the code compliance teams conduct most initial inspections on complaints and re-inspect properties with violations to determine whether the owner corrected the violation. Inspectors on the court team re-inspect properties with uncorrected violations and write citations for a property owner to appear in court. Court team inspectors then testify about the case in court. Despite the organizational separation, the office sometimes assigns an initial inspection to the court team if the case is expected to be highly hazardous.

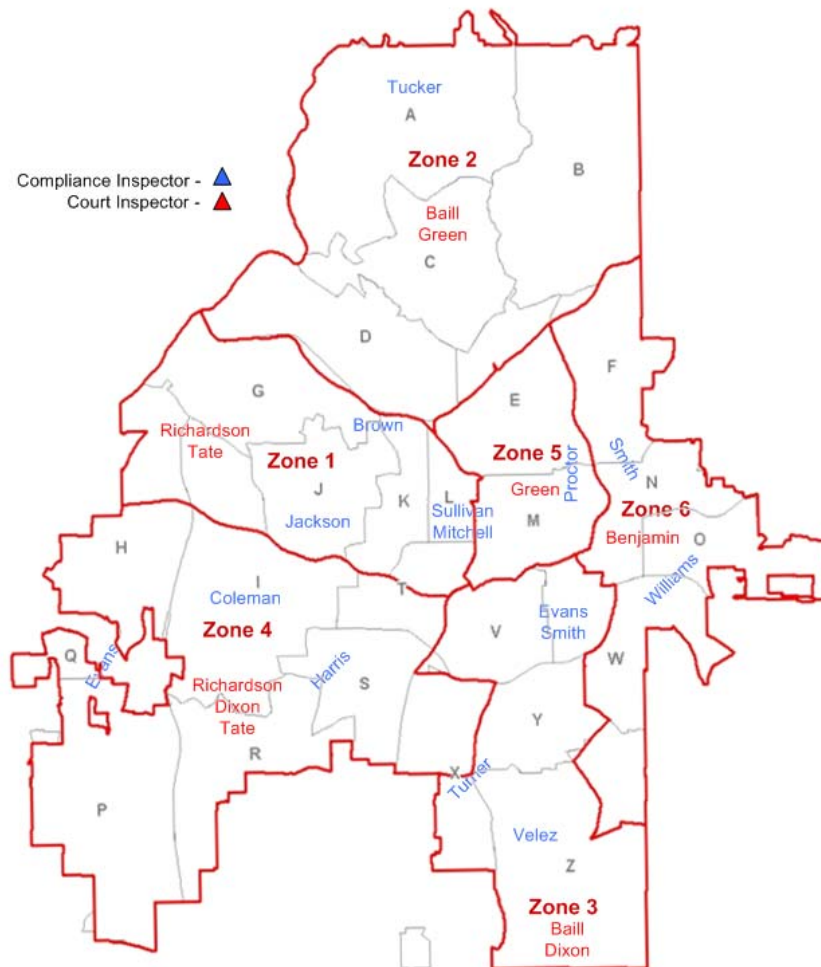
**Exhibit 1 - Office of Code Compliance Organizational Chart  
Fiscal Year 2010**



**Source:** Office of Code Compliance

Cases are assigned geographically. Inspectors on the code compliance teams cover cases within assigned NPUs (neighborhood planning units). NPUs are geographic groupings of neighborhoods with an organizational structure to provide residents information and solicit input on city plans and programs. The 13 inspectors assigned to code compliance teams as of January 2010 covered between one half and four NPUs each. Court compliance inspectors are assigned cases within police zones (see Exhibit 2).

## Exhibit 2 – Current Inspector Geographic Assignments



**Source:** Office of Code Compliance

**Code compliance overview.** Once assigned a complaint, the inspector surveys the property to identify code violations. The inspector documents violations on a residential, commercial, or zoning form, takes photographs of the violations, and issues a notice of non-compliance. The notice describes the violation and action needed, and notes when repairs must begin and must be completed.

The inspector must serve the property owner, operator, or occupant the notice within 30 days of the inspection.

In cases where the property is occupied and the owner or occupant refuses the inspector permission to inspect, the inspector must work with the solicitor to obtain a search warrant.

In cases where the property owner is unknown, staff conducts research to locate the owner. Staff may refer the property to the In Rem program if the property owner cannot be located or cannot afford to correct violations. Under In Rem, an independent review board or the Municipal Court can authorize the office to clean, close, or demolish a hazardous property that meets certain requirements.

Policy requires either two inspectors or an inspector and police officer to inspect vacant and open properties. The inspectors mount yellow placards on open and vacant properties with code violations. A placarded property cannot be occupied until repairs have been made and violations corrected.

Inspectors must re-inspect properties within 10 days of the notice of violation expiration. The inspector designates the case "complied" if the violation has been corrected and submits it to the supervisor to be closed. The inspector's supervisor may grant one extension if work is under way or the owner has a "genuine hardship." The extension cannot be longer than the initial correction notice period. Supervisors may grant further extensions for "good cause." If the owner has failed to comply, the inspector refers the case to the court inspection team.

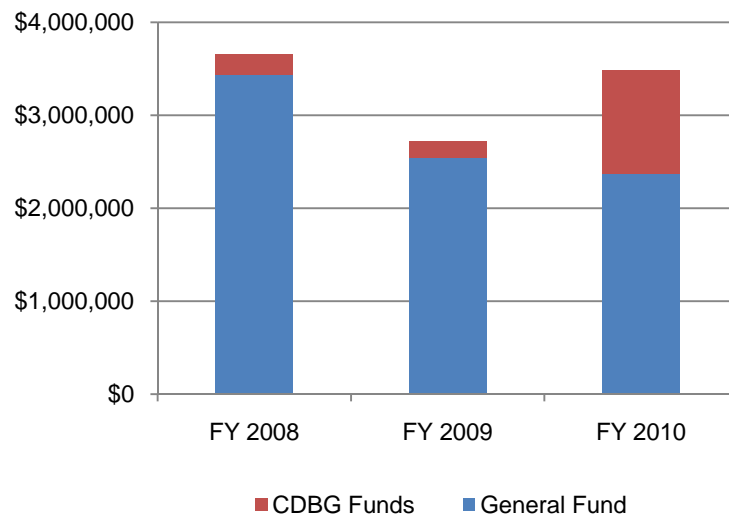
The court inspection team re-inspects properties with uncorrected violations and initiates court proceedings by scheduling the case and writing a citation to require the violator to appear in court. Court inspectors prepare their cases for court and attend the proceedings.

One judge hears code compliance cases. The judge may dismiss a case or impose penalties. The sentence for a first offense can be a fine between \$250-\$1,000, imprisonment of 60 days or less, or both. The range of fines increases for each repeat violation. The court issues a warrant if the property owner fails to appear at the hearing.

A flowchart of the code compliance process appears in Appendix B.

Code compliance funding has decreased over the past two years. Most of the office's funding is from the general fund. Its fiscal year 2010 general fund budget was about \$2.4 million, a 31% reduction from fiscal year 2008 (see Exhibit 3). The office also received about \$1.1 million in Community Development Block Grant Funds in fiscal year 2010, of which \$903,152 was used to fund the In Rem program. This amount is more than received in prior years for the program, and the office does not expect to receive this amount in future budget years.

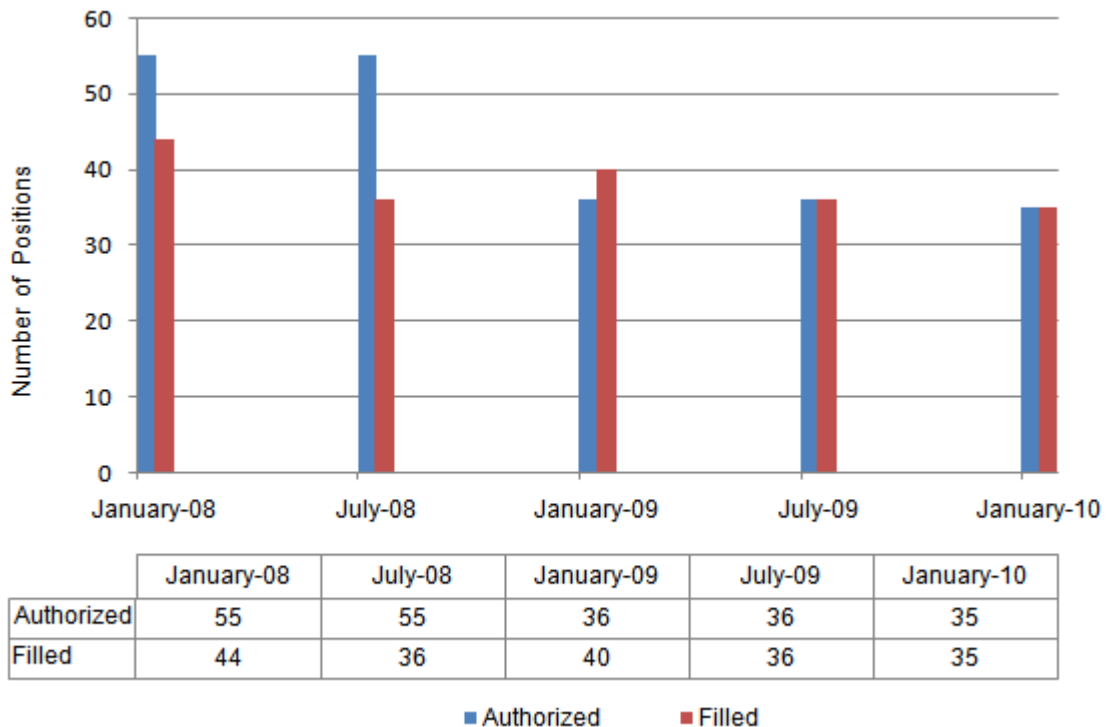
**Exhibit 3 - Office of Code Compliance Adopted Budget Fiscal Year 2008 through Fiscal Year 2010**



**Source:** Oracle; Fiscal Years 2008 through 2010 budget documents; Office of Code Compliance

The office was authorized 38 positions in fiscal year 2010, a reduction of 26 positions from 2008 (see Exhibit 4). The reduction affected vacant positions.

**Exhibit 4 - Office of Code Compliance – Number of Positions 2008 through 2010**



**Sources:** Oracle; Human Resources Position Report, January and July, 2008 through 2010; Final Action Legislation

**System upgrade intended to improve efficiency.** The Department of Planning and Community Development implemented Accela in November 2009 to upgrade its existing KIVA system. The city's press release described Accela as a web-based workflow management system to automate assigned tasks associated with permitting, code compliance, community development, planning, inspections, and emergency response. The upgrade was intended to promote real-time and therefore, more accurate information, and to allow citizens to post and track complaints. Office management expected code compliance inspectors to conduct more inspections because they can prepare and print citations and violation notices in the field.

Accela is not yet fully functional; the office documented system problems both before and after go-live. Office management continues to work with Accela representatives to correct problems. The office currently uses both the KIVA and Accela systems to access complaint data and report performance information.

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## Audit Objectives

This report addresses the following objectives:

- Is the KIVA and Accela data reliable to allow the department to manage its workload and support decision-making?
- What is the distribution of code complaints? How does it vary by inspector, location, time of year, and other factors?

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## Scope and Methodology

We conducted this audit in accordance with generally accepted government auditing standards. Our analysis of complaint data mostly focuses on fiscal year 2008 through January 2010.

Our audit methods included:

- interviewing management and code inspectors to understand the code compliance process
- reviewing the office's Standard Operating Procedures (SOPs) and relevant city code provisions
- compiling staffing data and analyzing trends
- analyzing the reliability of data from the KIVA and Accela systems
- observing code inspections and citation issuance with several code inspectors
- observing housing court proceedings
- assessing the reliability of reported performance data in ATLStat
- reviewing the office's methods for developing and calculating performance data
- examining the contract and testing documents for Accela implementation
- interviewing information technology and buildings staff to understand the Accela implementation process



Generally accepted government auditing 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.



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## Findings and Analysis

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### Management Lacks Information Needed to Assess Its Operations

The Office of Code Compliance lacks reliable data to prioritize, track, and manage its code compliance complaints, measure its progress toward meeting performance standards, or determine staffing requirements. The office also lacks written procedures for calculating and reporting workload and performance data. As a result, the office has publicly reported data that overstated its performance and misrepresented the makeup of its complaints.

The lack of written procedures for compiling both hardcopy and electronic data has contributed to incomplete and inaccurate data. We noted discrepancies between the office's hardcopy and electronic files. Office employees were unable to locate most paper files that we requested. The hardcopy files are disorganized, inconsistent, and incomplete.

While Accela was intended to streamline data collection and case management, data problems remain, in part because of unresolved system problems that the office identified both before and after the system went live and in part because of procedural problems. The staff has acknowledged that data for cases migrated from KIVA or entered into Accela are not entirely reliable. Further, the office failed to enforce data entry procedures and develop quality control procedures to ensure data for prioritizing and tracking new complaints was complete and accurate.

City Council members and other stakeholders have expressed the need to add code compliance inspectors to the office. Without reliable workload and performance data, the office is unable to accurately assess its staffing needs.

We recommend that office officials update procedures to reflect revised processes and develop measures that can be readily captured in its normal work flows. Going forward, Accela should be able to provide needed workload and performance data if the office develops clear requirements and quality control procedures for capturing and entering data into the system.

## Publicly Reported Information Overstated Performance

Information that the office reported to the mayor and City Council overstated its performance and misrepresented the makeup of complaints. Reports underestimated the time it took to complete first inspections, over counted the number of highly hazardous complaints, and over counted the number of complaints generated externally. We were unable to recalculate any measure reported on the office's ATLStat Scorecard in August 2009. Mayor's office staff rarely verifies the accuracy of departments' reported data.

Office staff manually entered an inspection date for complaints that had yet to be inspected; the office reported in November 2009 that the average time to inspect a highly hazardous case was 14 days while we calculated an average of 170 days. The office lacks written procedures for calculating and reporting workload and performance data. We recommend management develop procedures to ensure accurate data reporting.

**Office reports overstated performance.** Code compliance performance reports to the mayor and City Council understated the average amount of time it took to inspect a highly hazardous property once the city received a complaint — sometimes by weeks. The office reports average time to initial inspection for highly hazardous complaints as part of its ATLStat scorecard, compiled by the mayor's office monthly. The office's goal is to conduct these first inspections within 7 days of receiving the complaint. The office reported in August 2009 that the average time to complete a first inspection for a highly hazardous complaint was 12 days; however, we calculated an average time of 27 days and a median time of 21 days.

The staff member who compiled the office's performance data extracted inspection records for each month from the work management system and manually inserted the last day of the month for all records where the first inspection field was blank. The staff member told us that two previous office directors condoned this method of calculating elapsed time although they were aware that it gave the impression that code compliance officers conducted inspections sooner than they actually did. Both directors no longer work for the city. The staff member also told us that the Commissioner was not notified of the data issue; we noted that it was not reported to the city's Integrity Line. The greater the proportion of records extracted in a

month with blank inspection fields, the greater the distortion in the calculated result. For example, the office calculated the average time to inspect a highly hazardous case in November 2009 was 14 days, while we calculated the average time was 170 days. The department implemented Accela November 30, 2009, and the date of first inspection field was blank in more than 94% of the records extracted for the month.

**Office reports mischaracterized the composition of complaints.** The office's methods to compile the number of externally generated and highly hazardous complaints inflated case counts by up to 10% to 20%. The office reports the number of externally generated complaints — those initiated by the public or other agencies — on its ATLStat scorecard as a workload indicator. In August 2009, the office reported that it received 747 externally generated complaints. We identified 598 external complaints and 52 complaints with no source, a difference of 20%. We could not determine the reason for the overstatement.

The office reports average time to inspect and average days to bring highly hazardous violations into compliance as measures of its effectiveness. Historical code compliance records in KIVA have no field to flag highly hazardous complaints. Office staff identified highly hazardous complaints as those coded as category 1 or complaints for which a citation was written. But code compliance officers also write citations for property maintenance and zoning cases when property owners fail to voluntarily comply. Therefore, the office's calculations of times to inspect and times to comply include cases other than highly hazardous. In August 2009, 11% of the cases and 21% of the inspections were for cases that resulted in a citation.

**Neither office staff nor mayor's office staff verified the accuracy of performance data.** Using the office's data, we were unable to recalculate any of the code compliance measures reported on its August 2009 ATLStat scorecard. The office lacks policies and procedures for calculating and reporting performance measures. Office staff submits the data to ATLStat staff without internal review. Mayor's office staff told us that due to resource constraints, they do not review data supporting performance measures unless senior management questions the validity of reported measures. Mayor's office staff also said they had concerns in 2008 about code compliance's data and worked with the department to improve the accuracy of the

performance measures. However, data reliability continues to be a problem.

In order to ensure that the data submitted by departments are accurately reported for decision-makers, mayor's office staff should develop quality assurance procedures for departments' reported performance measures.

### **Poor Record Keeping and Quality Control Hindered Data Reliability Prior to New System**

Office employees used a combination of manual and KIVA data to measure performance and manage workload; however, we noted discrepancies between hardcopy and electronic files, including missing information and different re-inspection and compliance dates. The hardcopy files are disorganized, inconsistent, and incomplete. Neither office employees nor we were able to locate 21 of the 35 paper files that we requested, and basic complaint data was not captured consistently in the files we reviewed. The lack of written procedures for compiling both hardcopy and electronic data has contributed to incomplete and inaccurate data.

We recommend that office officials develop procedures for capturing and entering data into Accela and develop measures and workload data that can be captured electronically in its normal work flows. In addition, we recommend the office organize its file room for historical cases and any paper files created for new cases.

**Hardcopy files are in disarray.** We requested a random sample of 35 code compliance case files to compare to data



entered into KIVA and Accela. Neither we nor code compliance staff were able to locate 21 of the 35 files that we requested. The files are disorganized, inconsistent, and incomplete. The condition of the file

room contributed to our and the office's inability to find the

hardcopy files. The office has two file rooms — one for open and another for closed cases. While office staff told us that files prior to 2008 were archived, we found files dated back to 2003 and 2004 and observed stacks of disorganized 2006 and 2007 cases in the closed file room (see photo). Information was recorded inconsistently in the 14 files we were able to locate. For example, inspectors recorded the re-inspection dates in different places on the case history sheet, and inspectors' names were not always on the history sheets. Also, some information was missing from the files; three cases were missing compliance dates, one case was missing an initial inspection date, and one case was missing the first re-inspection date.

Now that inspectors are entering inspection results directly into Accela, the office plans to create paper files only for cases for which inspectors write citations. We recommend the office organize its file room so historical and any new case files are readily accessible.

**Electronic and hardcopy files are inconsistent.** We noted discrepancies between the hardcopy case files and data recorded in KIVA and subsequently migrated to Accela. Without reliable re-inspection dates, we and the office are unable to assess bottlenecks in code compliance. Also, without reliable compliance dates, we and the office are unable to accurately measure and report case outcomes. The results of our review suggest that KIVA data were unreliable prior to migration. The 14 case files we reviewed encompassed 15 violations. Of the 15 violations, 6 initial inspection dates, 11 first re-inspection dates and 10 compliance dates recorded in KIVA did not match the dates recorded in the file. Customer service staff entered inspection data into KIVA from inspectors' handwritten notes on guide sheets, which were kept in the hardcopy files; the electronic records should match the source data. Also, KIVA records were not consistent with inspectors' daily logs.

### **New System Failed to Resolve Data Problems**

The office's data reliability problems continued after the department implemented Accela, despite its intended benefits of streamlining data collection and case management. The city paid \$1.6 million to upgrade from KIVA to Accela, upgrade hardware, and migrate historical case data. The city accepted the system without ensuring all required data was migrated from KIVA to Accela. Also, office employees identified 65 hardware

and software problems before and after go-live in November 2009 that delayed entering information on new cases and resulted in some missing data. For example, the case type — needed to prioritize cases — was blank in 39% of cases entered in the first six weeks after go-live.

Office management acknowledged that the accuracy of case data is questionable and plans to prioritize open complaints and determine where they are in the process, and attempt to bring them into compliance. Management also plans to rely on citizens to file repeat complaints on cases that may have fallen through the cracks. We recommend that management develop data entry and quality control procedures to ensure data for assigning, prioritizing, tracking, and reporting on new complaints is complete and accurate.

**Inadequate testing and tight timeframe allowed incomplete data migration.** City staff accepted Accela and the historical data migrated from KIVA without adequate testing. The city's scope of work with Accela identified fields necessary for office staff to effectively manage historical cases. However, some of the data, such as the property owner fields, failed to migrate from KIVA to Accela. Without the owner data, office staff cannot assess whether a property owner is a repeat offender. Although city staff said they reviewed the system to ensure that all the data identified in the scope of work migrated to Accela, they were unable to provide us with any documentation of that review. City staff agreed to a data migration the week of November 23<sup>rd</sup>, shortly before go-live, which did not allow time for adequate review. All historical records appeared to migrate; the overall number of complaints in KIVA and Accela reconciled. However, we noted that some data fields failed to migrate. The city paid \$1.6 million to upgrade systems from KIVA to Accela, migrate historical case data, and upgrade hardware.

Measures of the time elapsed from when the office received the complaint to when the property was inspected and when it came into compliance are understated. About half of the 1,979 records entered in the first six weeks since go-live listed the source as re-entered cases. Open cases from KIVA migrated to Accela as read-only. Office staff must re-enter the case data in order to update the file, resulting in duplicate records. The re-entered records show the file date — which the office uses to identify when it receives a complaint — as the date it was re-entered.



System glitches and user errors affect reliability of data entered directly into Accela. Office staff has been unable to compile and report performance data since go-live because some data are incomplete due to system glitches:

- Zip code and NPU (neighborhood planning unit): 5% of records entered in the first six weeks since go-live had a blank or invalid zip code and 22% had a blank or invalid NPU. The office uses the zip code field to map the location of complaints and the NPU field to allocate resources. These fields are automatically generated through an interface with the city's GIS (geographic information system). Office staff told us that interruptions in the connection between the city's GIS and Accela system caused the blank fields.
- Violation type: 39% of records entered in the first six weeks since go-live had a blank violation type. The office uses this field, which designates whether a case is highly hazardous, property maintenance or zoning, to prioritize inspectors' workloads. This field is automatically generated based on the problems selected when a complaint is first entered into Accela. Office staff told us that the code that links the problem category to the violation type malfunctioned.

Office staff alerted Accela about the problems with the location and violation type fields in January and April 2010, respectively; as of April 8, 2010, these problems had yet to be resolved.

Inspectors may be omitting or delaying the entry of inspection data. The number of inspections per day by inspector in the first six weeks after go-live ranges from 1 to 39, with 161 instances of one inspection per day. During our ride-alongs with inspection staff, we observed inspectors completing an average of 17 inspections per day. We noted several instances when the inspectors did not enter inspection results into Accela at the time of inspection; one inspector said writing the information down is faster than using the computer. All of the inspectors we talked to said Accela is not user-friendly. Office management acknowledged that inspectors may not be entering case data into the system. Data omissions or delayed entry of data impairs the reliability of data in Accela.

We recommend office officials develop job expectations for inspectors and supervisors that require prompt, accurate entry of inspection data into the system.

### **Management Needs Reliable Data to Assess Staffing Needs**

City Council members and other stakeholders have expressed the need to add code compliance inspectors to address a perceived backlog of complaints. The new administration has reorganized code compliance inspectors to reduce duplicated inspections. Without reliable workload and performance data, we could not assess efficiency or staffing needs, but agree that the 2009 court team process appeared duplicative. Distributing cases by NPU results in an uneven caseload. Uneven workload and seasonal fluctuations could affect the office's ability to respond promptly to complaints. Management needs reliable workload and performance data to assess staffing needs and allocate staff.

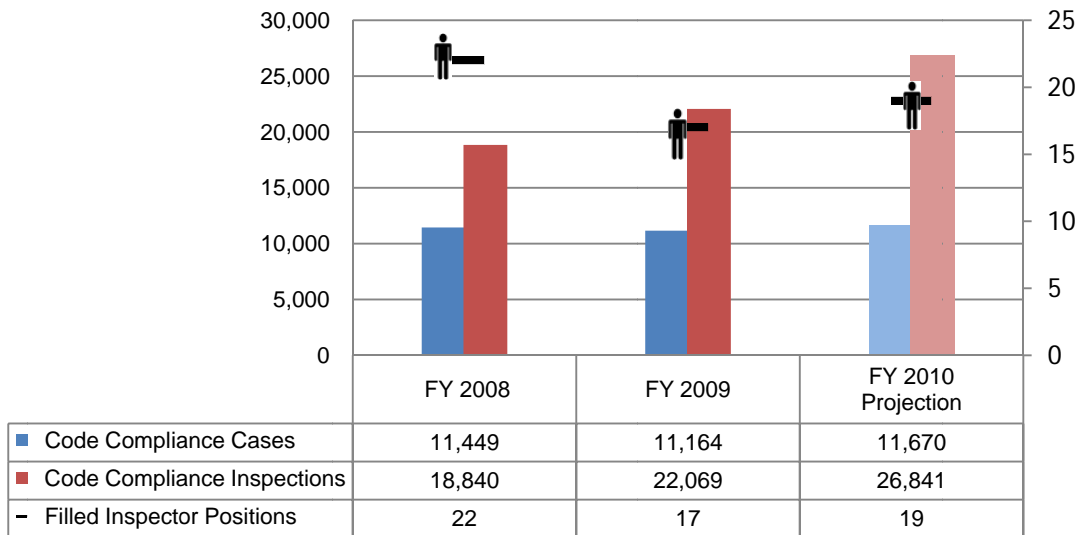
#### **Better workload data is needed to assess staffing needs.**

Council members recently stated the office needed additional staff to eliminate the backlog and address the rising number of complaints. Complaints increased 10.6% and inspections increased 16.9% between fiscal year 2008 and 2009, while the number of inspectors on staff decreased by 22.7% (see Exhibit 5). Although these numbers seem to support that the office needs additional inspectors, the fiscal year 2009 inspection workload comes to an average of 6 inspections per inspector per workday, which is well below any of the office's performance standards over the past few years. Code compliance complaints in fiscal year 2010 appear to be on a pace to exceed fiscal year 2009, but based on the department's performance standards, should be manageable for a staff of 19 inspectors. And some of the fiscal year 2010 cases are re-entered historical complaints rather than new workload. We were unable to assess workflow and staffing needs in depth because of inconsistencies in system data.

Office management has changed its performance standard for the number of inspections completed per day without a clear basis in the workload demand. Our review of ten inspector performance evaluations for fiscal year 2009 showed three inspectors were evaluated against a standard of 10 inspections per day; four against a standard of 15; and three against a standard of 20. According to mayor's office staff, office management has reset the standard to 10 inspections per day. The office compiled workload measures for the evaluations from

inspectors' written daily logs rather than from KIVA. We were unable to assess average daily workload because re-inspection dates recorded in KIVA were unreliable.

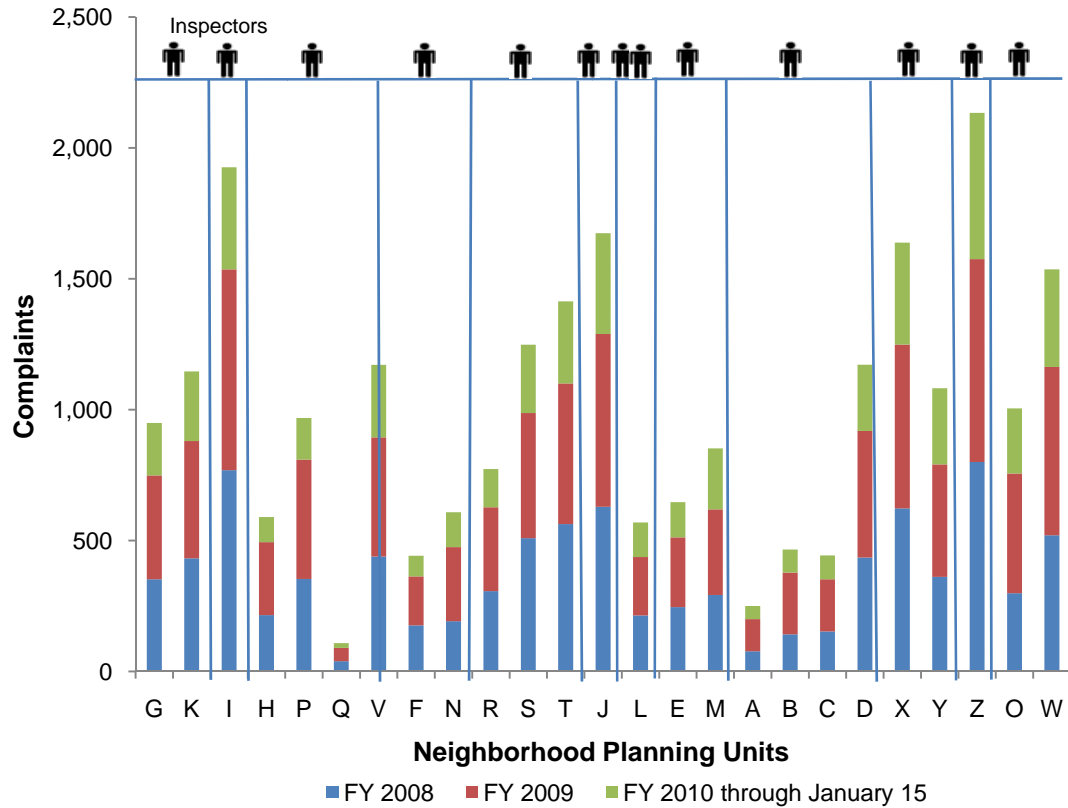
**Exhibit 5 – Code Compliance Cases by Fiscal Year**



**Source:** Accela data, July 1, 2007 through January 15, 2010

**Workload distribution is uneven.** The current distribution of NPU assignments results in an uneven caseload per inspector. Office management allocates code compliance inspectors by NPU. The city's neighborhoods are grouped into 25 NPUs, which provide a means for residents to participate in city planning and development activities and to receive information and provide input on different city government functions. While there may be value in having the same inspector work different cases in a neighborhood, workload by NPU varies significantly (see Exhibits 6 and 7). The number of complaints and inspections in NPU Q, for example, is less than a tenth of the number of complaints and inspections in NPU Z. Based on inspector assignments, some inspectors are assigned 600-700 cases per year while other inspectors are assigned over 1,000 cases per year. We were unable to assess the types of complaints because of inconsistencies in how case types and problem codes were recorded. Uneven distribution of workload could affect the office's ability to respond promptly to complaints.

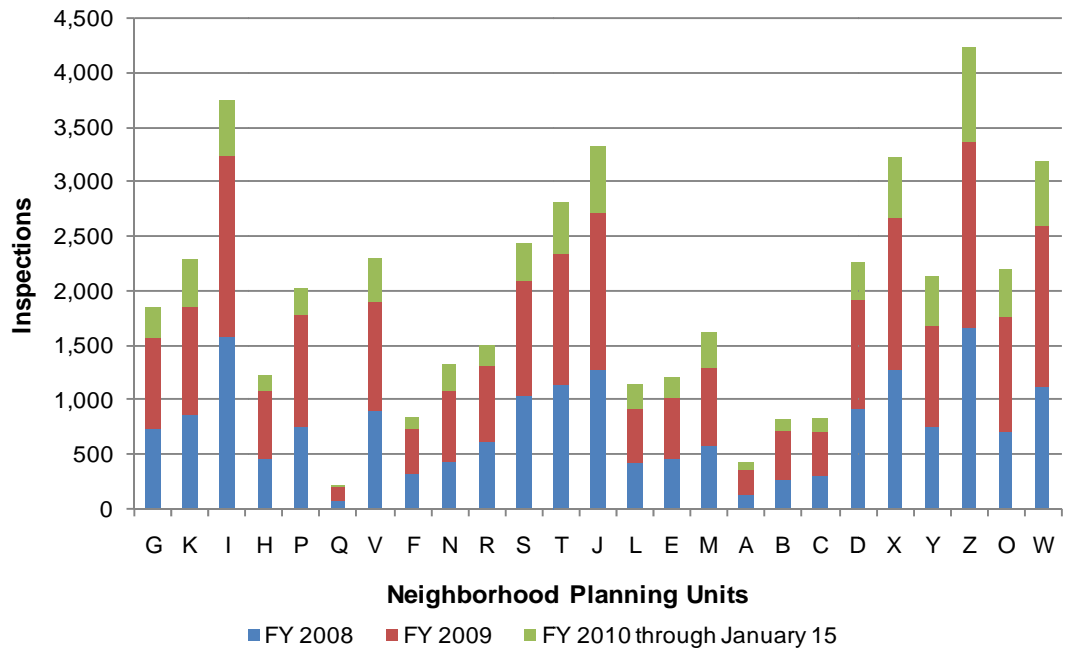
**Exhibit 6 – Code Complaints by Neighborhood Planning Unit**



Note: NPU V is covered by inspectors in the adjacent NPUs

Source: Accela data

**Exhibit 7 – Code Inspections by Neighborhood Planning Unit**

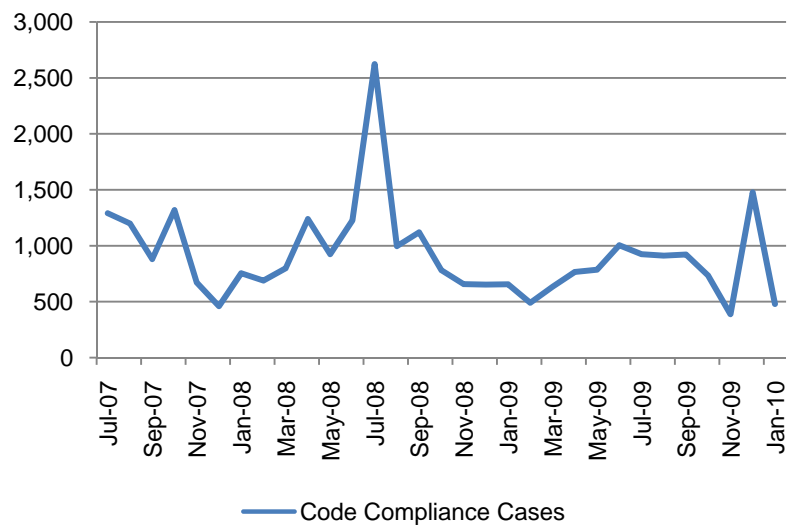


Source: Accela data

Because re-inspection dates were unreliable, we were unable to assess whether organizing inspectors into separate compliance and court teams increased overall efficiency. In fiscal year 2009, the office created a separate team to initiate court proceedings when a property owner failed to correct a violation. The intent was to reduce the amount of time inspectors spent in court because only court team inspectors would appear in court. Logic suggests that the structure would result in some duplicated work because, in order to testify in court, a court inspector needed to re-inspect a property that another inspector had already re-inspected. The average number of inspections per complaint increased by about 5.6% from fiscal year 2008 to 2009, from about 2.18 to 2.30 inspections per complaint. The mayor's office plans to restructure the teams so that each inspector handles a complaint from start to finish.

Seasonal variation in code complaints could also affect workload. As shown in Exhibit 8, the number of complaints appeared to increase during the warmer months. We do not know what caused the spike in July 2008, which could be a data entry anomaly rather than an influx of new code compliance cases. Seasonal fluctuations could affect the office's ability to respond promptly to complaints, especially if inspectors' scheduled absences are higher in summer months.

**Exhibit 8 – Code Compliance Cases by Month, Fiscal Year 2008 through January 15, 2010**



**Source:** Accela data, Fiscal Year 2007 through January 15, 2010.



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## Recommendations

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In order to provide reliable data for decision-making, the Commissioner of the Department of Planning and Community Development should:

1. Develop procedures on data collection and quality assurance to ensure data for assigning, prioritizing, tracking, and reporting on new complaints is complete and accurate.
2. Develop measures and workload data that can be captured electronically in its normal work flows.
3. Organize its file room for historical cases and any paper files created for new cases.
4. Develop job expectations for inspectors and supervisors that require inspectors to enter inspection results promptly and accurately.

In addition, in order to ensure that the data submitted by departments are accurately reported for decision-makers, the mayor's office staff should

5. Develop quality assurance procedures for departments' ATLStat submissions.





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## Appendices

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## Appendix A Management Review and Response to Audit Recommendations

Report # 09.07	Report Title: Office of Code Compliance	Date: 06/11/2010
Recommendation Responses - Department of Planning and Community Development		
Rec. #1	The Commissioner should develop procedures on data collection and quality assurance to ensure data for assigning, prioritizing, tracking, and reporting on new complaints is complete and accurate.	Agree
<div> <div><u>Proposed Action:</u></div> <div>The Department of Planning and Community Development concurs with Recommendation #1. The Department is collaborating with the Office of the Mayor to complete a re-engineering process for the Office of Code Compliance. The re-engineering process includes but is not limited to establishing measurable performance outcomes; revising the Standard Operating Procedures to reflect current practices; and developing procedures to ensure the accuracy of performance and workflow data for the Office.</div> </div> <div> <div><u>Implementation Timeframe:</u></div> <div>Ongoing - Process should be complete and fully implemented by the first quarter of FY11.</div> </div> <div> <div><u>Responsible Person:</u></div> <div>Hans Utz (Office of the Mayor), Terri Lee (Deputy Commissioner, DPCD). Once a Director is selected for the Office of Code Compliance, the responsibility to ensure compliance will lie with that individual.</div> </div>		
Rec. #2	The Commissioner should develop measures and workload data that can be captured electronically in its normal work flows.	Agree
<div> <div><u>Proposed Action:</u></div> <div> <p>The Department of Planning and Community Development concurs with Recommendation #2. The performance metrics for the Office are currently under development and are separated within the following categories:</p> <ul style="list-style-type: none"> <li>• Overall Departmental Measures</li> <li>• Supervisor's Metrics</li> <li>• Inspector's Metrics</li> <li>• Research Metrics</li> <li>• In Rem</li> </ul> <p>Representatives from the Department of Information technology are designing reports that may be electronically generated through the Accela system.</p> </div> </div> <div> <div><u>Implementation Timeframe:</u></div> <div>Ongoing - Process should be complete and fully implemented by the first quarter of FY11.</div> </div> <div> <div><u>Responsible Person:</u></div> <div>LaMonte Carr, (Department of Information Technology) and Hans Utz (Office of the Mayor)</div> </div>		

Rec. #3	The Commissioner should organize the file room for historical cases and any paper files created for new cases.	Agree
<p><b><u>Proposed Action:</u></b> The Department of Planning and Community Development concurs with Recommendation #3 and will proceed with creating an organized and structural environment for the file room.</p> <p><b><u>Implementation Timeframe:</u></b> Ongoing - Process should be complete and fully implemented by the first quarter of FY11.</p> <p><b><u>Responsible Person:</u></b> Hans Utz (Office of the Mayor), Terri Lee (Deputy Commissioner, DPCD).</p>		
Rec. #4	The Commissioner should develop job expectations for inspectors and supervisors that require inspectors to enter inspection results promptly and accurately.	Agree
<p><b><u>Proposed Action:</u></b> The Department of Planning and Community Development concurs with Recommendation #4. Prior to the release of the audit report, the requirement to enter inspection results promptly and accurately was established in April 2010. The following process has been implemented and is currently being monitored by the Code Enforcement Supervisors:</p> <ul style="list-style-type: none"> <li>• The Code Enforcement Supervisors will identify the priority inspections, re-inspections, citations service for each Inspector.</li> <li>• Citation service attempts should not exceed two attempts. After the second service attempt, please forward to the Customer Service Representative for processing.</li> <li>• Additional inspections may be added based upon extenuating circumstances. Examples include complaints received from the Administration, Council Complaint, and/or Highly Hazardous situations.</li> <li>• All Inspectors must complete the Code Compliance Guide Sheet for each inspection assigned/conducted or citation served.</li> <li>• All Inspectors are expected (at a minimum) to complete the field work on all assigned inspections for that day.</li> <li>• Once field inspections are completed, Inspectors are expected to enter the results of each inspection into the Accela system in the office. Also, office time may include ownership research. Each Inspector should investigate no more than one information source for each owner before transferring to the research team.</li> <li>• The inspection results or citation served activity must be entered into Accela using the information identified on the Guide sheet.</li> <li>• All Guide Sheets must be attached to the Inspector's Daily Logs for review and approval by the Team Supervisor.</li> </ul> <p><b><u>Implementation Timeframe:</u></b> Ongoing</p> <p><b><u>Responsible Person:</u></b> Code Enforcement Supervisors</p>		

Report # 09.07

Report Title: Office of Code Compliance

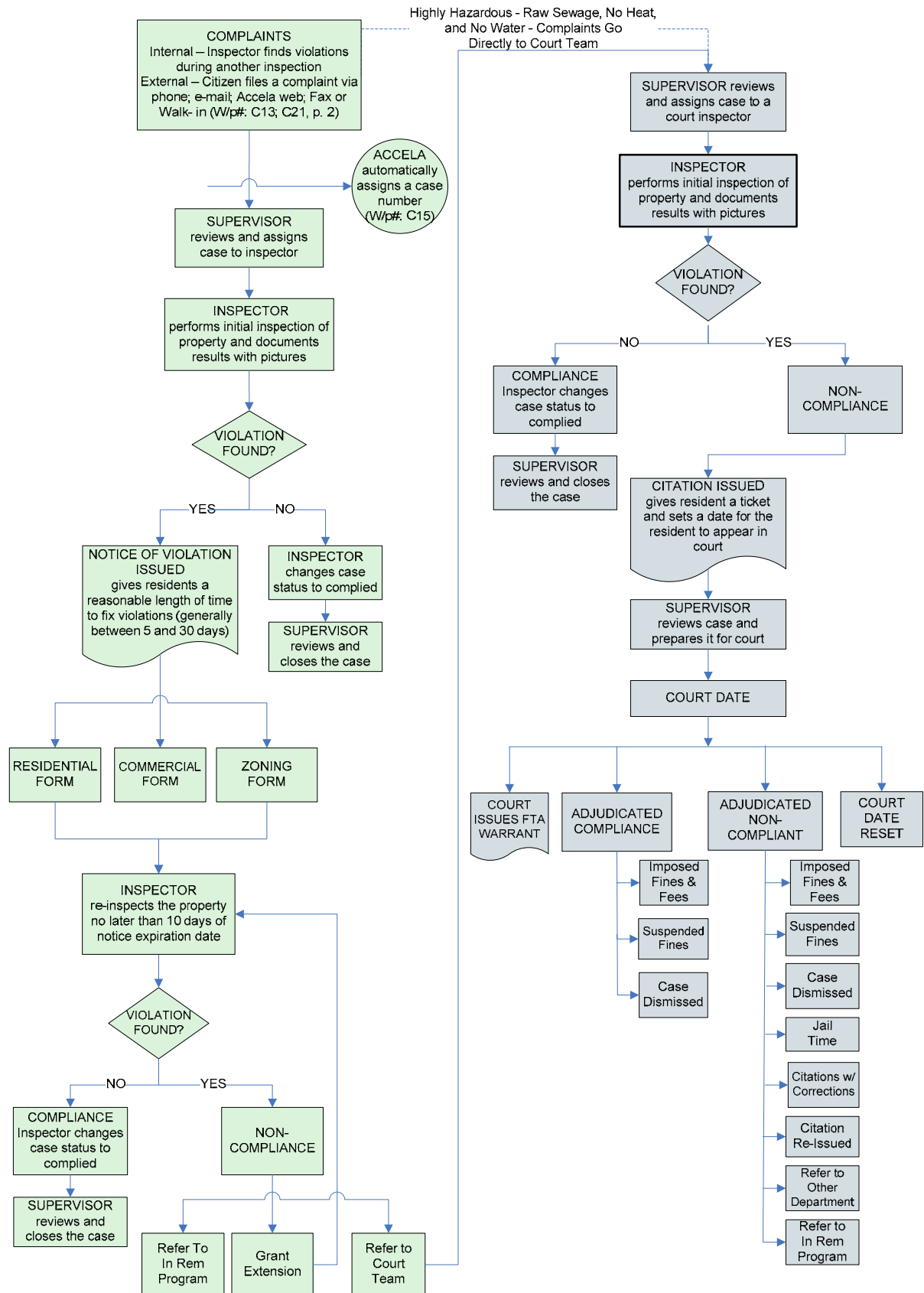
Date: 06/25/2010

Recommendation Responses - Office of the Mayor

Rec. #5	Develop quality assurance procedures for departments' ATLStat submissions.	Agree
<u>Proposed Action:</u>	The mayor's office staff plans to develop citywide quality assurance procedures for ATLStat submissions, and the Office of Code Compliance is the pilot project.	
<u>Implementation Timeframe:</u>	December 31, 2010	
<u>Responsible Person:</u>	Caroline Fooshee	



## Appendix B Code Compliance Process



Source: Code compliance procedures; City code; and staff interviews





## Appendix C Office of Code Compliance Response



### CITY OF ATLANTA

DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT

55 TRINITY AVENUE, S.W. SUITE 1450 – ATLANTA, GEORGIA 30303

404-330-6070 – FAX: 404-658-7638

<http://www.atlantaga.gov/Government/Planning.aspx>

KASIM REED  
MAYOR

JAMES E. SHELBY  
COMMISSIONER

#### MEMORANDUM

TO: Leslie Ward, City Auditor

FROM: James E. Shelby, Commissioner

DATE: June 16, 2010

SUBJECT: Performance Audit – Office of Code Compliance

CC: Terri M. Lee, Deputy Commissioner

The Department of Planning and Community Development respectfully acknowledges receipt of the Performance Audit for the Office of Code Compliance. I would also like to thank you for the professionalism and assistance provided to my Department by the staff of the City Auditor's Office.

While the Department is in support of the Audit recommendations, please allow me to share the actions that we have initiated and will continue to take in an effort to improve the efficiency and effectiveness of the Office of Code Compliance (OCC). The Department, through collaborative efforts with the Office of the Mayor, has identified primary issues that have impeded the progress and functions of OCC. The following identified issues are as follows:

- (1) *The workflow process*: The prioritization and assignment of complaints.
- (2) *Technology and system issues*: The implementation of Accela and ensuring the functionality of the system for the OCC.
- (3) *Organization Structure*: Impractical organizational structure and duplication of work.

The Department is aggressively taking the required steps and actions to address the identified impediments. Of specific note, the Department is coordinating its efforts with DIT to ensure the functionality and processes of the Accela system. To that end, DIT has assigned a project manager to lead this effort and representatives of Accela continue to

be engaged in the discussions and ongoing implementation of the system. Specifically, in May 2010, Accela representatives participated in a work session with the OCC employees to observe the system processes and practicality of its field use. This and other efforts will be made by both DPCD and DIT to guarantee that the City receives the services essential to ensure full functionality of the system.

As noted within the report, the City Auditor's office has identified 4 recommendations for the Department to address in response to the Audit.

The four recommendations are stated as follows:

**Recommendation No. 1: The Commissioner should develop procedures on data collection and quality assurance to ensure data for assigning, prioritizing, tracking, and reporting on new complaints is complete and accurate.**

**DPCD Response:** The Department of Planning and Community Development concurs with Recommendation #1. The Department is collaborating with the Office of the Mayor to complete a re-engineering process for the Office of Code Compliance. The re-engineering process includes but is not limited to establishing measurable performance outcomes; revising the Standard Operating Procedures to reflect current practices; and developing procedures to ensure the accuracy of performance and workflow data for the Office.

**Recommendation No. 2: The Commissioner should develop measures and workload data that can be captured electronically in its normal work flows.**

**DPCD Response:** The Department of Planning and Community Development concurs with Recommendation #2. The performance metrics for the Office are currently under development and are separated within the following categories:

- Overall Departmental Measures
- Supervisor's Metrics
- Inspector's Metrics
- Research Metrics
- In Rem

Representatives from the Department of Information technology are designing reports that may be electronically generated through the Accela system.

**Recommendation 3: The Commissioner should organize the file room for historical cases and any paper files created for new cases.**

**DPCD Response:** The Department of Planning and Community Development concurs with Recommendation #3 and will proceed with creating an organized and structural environment for the file room.

**Recommendation No. 4:** The Commissioner should develop job expectations for inspectors and supervisors that require inspectors to enter inspection results promptly and accurately.

**DPCD Response:** The Department of Planning and Community Development concurs with Recommendation #4. Prior to the release of the audit report, the requirement to enter inspection results promptly and accurately was established in April 2010. The following process has been implemented and is currently being monitored by the Code Enforcement Supervisors:

- The Code Enforcement Supervisors will identify the priority inspections, re-inspections, citations service for each Inspector.
- Citation service attempts should not exceed two attempts. After the second service attempt, please forward to the Customer Service Representative for processing.
- Additional inspections may be added based upon extenuating circumstances. Examples include complaints received from the Administration, Council Complaint, and/or Highly Hazardous situations.
- All Inspectors must complete the Code Compliance Guide Sheet for each inspection assigned/conducted or citation served.
- All Inspectors are expected (at a minimum) to complete the field work on all assigned inspections for that day.
- Once field inspections are completed, Inspectors are expected to enter the results of each inspection into the Accela system in the office. Also, office time may include ownership research. Each Inspector should investigate no more than one information source for each owner before transferring to the research team.
- The inspection results or citation served activity must be entered into Accela using the information identified on the Guide sheet.

I sincerely appreciate the efforts of the Internal Audit Office in assisting to identify ways to improve the effectiveness and efficiency of the City's code enforcement function. If you have any questions or concerns, please contact me at ext. 6037.