



Metropolitan King County Council
King County Auditor's Office
Cheryle A. Broom, *King County Auditor*
King County Courthouse
516 Third Avenue, Room W1033
Seattle, WA 98104-3272
206.296.1655 Fax 206.296.0159
TTY 296-1024
www.kingcounty.gov/operations/auditor.aspx

M A N A G E M E N T L E T T E R

DATE: November 23, 2009

TO: Metropolitan King County Councilmembers

FROM: Cheryle A. Broom, ^{cb} King County Auditor

SUBJECT: Follow-up on Implementation of Recommendations from 2008
Performance Audit of Code Enforcement

This memorandum provides the results of our follow-up review of the 2008 Code Enforcement performance audit. The audit evaluated whether code enforcement management, policies, procedures, and practices promoted consistency, transparency, and accountability.

Our follow-up review found that Code Enforcement had fully implemented or was in the process of implementing all eight recommendations from the original audit. Another follow-up will be needed in 2010 to track the status of implementation currently in progress.

Background

In 2008, the auditor's office completed a performance audit of Code Enforcement. The objective of the audit was to analyze Code Enforcement's compliance with laws, regulations, and procedures; its prioritization, investigation, and tracking of cases; and its communications with property owners.

Our 2008 recommendations were grouped into three categories: Operations, Management Controls, and Strategic Planning. This management letter notes the progress that has been made in implementing our recommendations in each of these categories.

Code Enforcement Operations

In 2008, we found that that Code Enforcement's written communications with property owners frequently contain inaccurate information – and, in some cases, do not comply with legal requirements.

We recommended enhancing communication, education, and outreach with property owners and other code enforcement stakeholders.

Recommendation 1: Code Enforcement should develop a set of educational materials about the code enforcement process, common code violations, and the kinds of activities that require a permit.

Recommendation 2: Code Enforcement should include with its Violation 1 letters educational materials on the code enforcement process, including an accurate description of the Notice and Order, appeal, and penalty processes.

Recommendation 3: Code Enforcement should ensure that all communication between CEOs (Code Enforcement Officers) and property owners complies with the requirements established in King County code and that all templates used by CEOs for written communication are reviewed and approved by Code Enforcement management prior to use.

Status: Implemented

Our 2009 follow-up found that all three recommendations have been fully implemented. Code Enforcement has developed two brochures that accompany its violation letters. The brochures explain the code enforcement process using graphics and plain language.

In addition, the section revised its letter templates to improve the process descriptions. The code enforcement supervisor reports that she has implemented a system of spot checking letters from CEOs to ensure that templates are being used.

Code Enforcement Management Controls

In 2008, we found that CEOs' inconsistency in code enforcement practices was tied to an absence of clear policy direction. We also found that Code Enforcement's data files were missing key data and contained inconsistently entered data. Further, Code Enforcement's performance reports did not provide information for evaluating the section's outcomes.

We recommended that Code Enforcement develop clearer policies and procedures, keep more accurate and complete records, and create useful performance reports.

Recommendation 4: Code Enforcement should revise its policies and procedures.

Status: In progress

Our 2009 follow-up found that Code Enforcement has taken initial steps to develop a new policies and procedures manual. These steps include identifying new requirements for policies and procedures and establishing a stakeholder group to review the manual. Code Enforcement plans additional steps to outline expected outcomes, hire a consultant to write the manual, and route the manual through internal and stakeholder review. Code Enforcement expects to complete the manual in April 2010, which is consistent with the implementation schedule outlined in the County Executive's formal response to our 2008 audit.

We will follow up next year with Code Enforcement on the status of the policies and procedures manual.

Recommendation 5: The Department of Development and Environmental Services (DDES) should assist Code Enforcement in developing an effective staffing model.

Status: In progress

Our 2009 follow-up found that Code Enforcement has created a new staffing model, using guidelines developed in the 2008 audit. This includes scaling back time task codes (from 136 to 39), training staff on proper time coding, and monitoring time entry to promote and ensure consistency.

In 2010, Code Enforcement will improve upon the staffing model created in 2009. The 2010 model will have a full year of data based on the new time codes and entered by staff trained in the new system. Code Enforcement will also refine the workload expectations (caseload per officer) for the 2010 model.

We will follow up next year with Code Enforcement on the effectiveness of the 2010 staffing model.

Recommendation 6: Code Enforcement should improve records management.

Status: In progress

Our 2009 follow-up review found that elements of this recommendation have been implemented. Staff have been trained on the importance of accurate timekeeping. Management has established a process to review case files for accuracy and completeness. A temporary set of controls have been put in place to prevent missing records while the department awaits the delivery of its new permitting system.

As mentioned above, Code Enforcement's policies and procedures manual has not yet been completed; therefore, the 2008 audit's recommendation to use that manual to emphasize good recordkeeping has not yet been implemented.

We will follow up next year to verify final implementation of this recommendation.

Recommendation 7: Code Enforcement should enhance performance reporting by ensuring that it provides useful information about the section's outcomes, including the ability to meet the section's goals and adherence to legal requirements.

Status: In progress

Management has initiated meetings with the county Performance Management Office to develop standard performance measures to use in reports, based on industry standards.

Code Enforcement plans to use the results of its meetings with the Performance Management Office to provide the vendor of the department's new permitting software with instructions for creating performance reports. Development of these reports is ongoing.

We will follow up next year with Code Enforcement on the development of performance reports.

Strategic Planning

The 2008 audit found that Code Enforcement had not developed an integrated strategic plan. Without such a plan, Code Enforcement lacked a framework that articulates its priorities and provides a means for tracking true performance.

We recommended that, as the section implements the recommendations related to Code Enforcement operations and management controls, it do so in conjunction with the development of a clarified mission, goals to support the mission, and outcome-based performance measures that can help the section evaluate its success in meeting its goals.

Recommendation 8: DDES should assist Code Enforcement in developing a new strategic plan, including a mission statement, goals, and performance measures and targets.

Status: In progress

Our 2009 follow-up found that Code Enforcement has worked with the county Performance Management Office to develop a new mission statement and vision. Code Enforcement has also identified several potential performance measures.

Management plans to work collaboratively with the Performance Management Office to ensure that final performance measures are consistent with the department's and county's goals and performance measures.

We will follow up next year with Code Enforcement on the status of their strategic plan.

Rob McGowan, Principal Management Auditor, and Cindy Drake, Senior Management Auditor, conducted this follow-up review. Please contact Rob at 296-0368 or me at 296-1655 if you have any questions about the issues discussed in this letter.

CB:RM:jl

cc: Stephanie Warden, Director, Department of Development and Environmental Services
Deidre Andrus, Supervisor, Code Enforcement
Caroline McShane, Deputy Finance Director, Department of Executive Services
Beth Goldberg, Acting Director, Office of Management and Budget
Rick Bautista, Principal Legislative Analyst, King County Council

