

# 1. Project Introduction and Executive Summary

---

Matrix Consulting Group was retained by the Washington County, Oregon to conduct a comprehensive review of the County's code compliance activities. The County conducted this study to evaluate existing services and identify opportunities to improve operations. As part of this assessment, the County requested a thorough review of staffing, organizational structure, processes, and technology. The County's goal is to identify changes that would increase efficiency and improve customer service while continuing to fulfill its regulatory responsibilities.

## 1. Study Scope and Methodologies

The Matrix Consulting Group's project team utilized a wide variety of data collection and analytical techniques, including the following:

- **Key Issues:** Developed an in-depth understanding of key issues impacting key areas of the code compliance processes. Conducted multiple interviews with staff representatives from each functional area as well as with commissioners. Interviews focused on determining roles and responsibilities of staff, levels of services provided, resources available to perform said services, and current or potential issues.
- **Current State Assessment:** The project team developed a current state assessment that captured current staffing levels, roles and responsibilities, workload, and performance metrics for each operational area. This document was utilized as a base point of comparison for future analysis to demonstrate how the changes recommended differed from existing practice.
- **Stakeholder Survey and Focus Groups:** The project team surveyed the Washington County community on their experiences and thoughts related to the County's code compliance activities. The survey allowed these community members to share their thoughts on the strengths as well as opportunities for improvement of current processes. In addition, the consulting group and project team staffed a booth at the Aloha Farmers Market and attended an Aloha Business Association meeting to solicit feedback on code compliance activities in the County.
- **Best Management Practices:** A best management practices assessment was conducted that compared current code compliance practices to industry best practices. The project team focused on best management practices for management and administration, process, staffing levels, organizational structure, policies, and technology utilizations.

- **Recommendations.** Based on the project team’s activities and initial findings, the team analyzed issues, explored alternative service delivery options, and developed recommendations for a more effective process. These recommendations extend to staffing, services, processes, and technology usage with the goal of identifying reforms to assist the County in reaching its goals.

Each of these sections provides recommendations and insight into County code compliance practices, processes, technology, organizational and staffing needs to implement the recommendations.

## 2. Key Strengths and Challenges of the Organization

While the focus of this study was to identify improvement opportunities, it is important to also point out areas where the organization is operating well and to ensure that these strengths are maintained and reinforced. Some of the key strengths of the County’s code compliance operations include:

- The County has a compliance-centric focus. Staff provide numerous opportunities to the property owner to correct issues, and they take into consideration the unique situation of each individual, including lack of resources, mental health issues, and not understanding the County’s requirements.
- The County has access to a robust software system to enter and track violations and has the ability to input data in the field, for most code compliance functions.

The study also identified a number of key challenges facing the code compliance process across land use, health, solid waste, and Sheriff’s operations. Notable issues include:

- For community members seeking to report code violations, the process of reaching the appropriate individual can be confusing.
- Some violations involve multiple departments and divisions; in these cases, it can be difficult for the property owner to navigate the different issues raised and understand the process of fully mitigating violations to the satisfaction of the County as a whole (not just one department or division).
- For violations in which the property owners are unwilling or unable to resolve issues, there are few consequences or mechanisms to achieve resolution. This can lead to complacency on the part of property owner as well as a worsening of conditions on the property over time.
- Staff lack clarity on what steps to take if the County does decide to commence compliance action. These actions are rare because under the current framework,

many types of cases require significant financial resources, staff effort and involvement of County Counsel on each case.

### 3. Summary of Recommendations

Based on the project team's assessment and analysis, there are several recommendations for each topic covered in this assessment. These are discussed in detail throughout this report and summarized in the table below.

The following chapters provide the details of the analysis and findings that support each of the recommendations. Fiscal impacts associated with each recommendation is included in Chapter 7 – Fiscal Analysis.

#	Recommendation
<b>Equity and Inclusion</b>	
1	Continue to monitor and analyze submitted complaints based on census tract to identify trends over time.
2	Future data collection should allow for greater analysis related to complainants, disposition of cases, and whether landlord/tenant issues are involved.
3	Concentrate education, outreach and support for code-related issues in Equity Focus Areas (EFAs), including assistance with avoiding common violations (e.g., through neighborhood bulk collection and clean-up programs). This education should be provided in multiple languages and through multiple mediums to improve its accessibility to all cultural groups and income levels in the County.
4	Concentrate mitigation assistance funding programs on lower-income census tracts and avoid compliance mechanisms that can lead to spiraling issues in cases where the property owner or violator lacks the financial means to address the issue.
<b>Organization and Staffing</b>	
5	Centralize complaint intake and adjudication, while continuing a partially de-centralized approach for case investigation, including inspections and identification of violations.
6	Add a Code Compliance Coordinator to provide a central clearinghouse for information regarding code violations, intake of complaints, and management and tracking of complaints within Accela, and creation of performance and workload reports for managers.
7	Assign a single County Counsel staff member to lead and advise on adjudication efforts related to code compliance across the County. The initial mandate for this individual should be to standardize the legal basis for civil enforcement.

## # Recommendation

- 
- 8 The same County Counsel staff member should lead an effort to revise County Code Title 1 sections related to code compliance adjudication, creating a consistent approach regardless of whether the code case involves health, solid waste, land use, or vehicles in the Right of Way.
- 
- 9 Formalize existing cross-departmental working groups on Code Compliance to enhance consistency and improve communications.
- 
- 10 A hybrid centralized/decentralized approach should be implemented that centralizes intake and adjudication but with investigations continuing to be undertaken by the divisions most familiar with the issues at hand.
- 
- 11 As reflected in Recommendation #6, one additional position of code compliance coordinator should be created. No additional staff are recommended at this time but some responsibilities should be shifted to this new position.
- 
- 12 The Code Compliance Management Committee should be tasked with reviewing data on code compliance activities to identify potential impacts on equity and inclusion.
- 
- 13 The Code Compliance Management Committee should provide leadership on complex properties and issues with the aim of preventing these issues from becoming too complex or costly to resolve.

## Process

- 
- 14 Clarify “complaint driven” policy to explicitly include any violations observed by County staff that may pose a health, safety, or environmental threat.
- 
- 15 Train staff to take into consideration potential bias from those who report code violations when determining an appropriate response.
- 
- 16 Designate a maximum number of re-inspections allowed prior to requiring that legal, citation, or remediation processes must then be taken.
- 
- 17 Establish a clear policy on when to move to formal enforcement action.
- 
- 18 Where feasible, create a consistent approach to enforcement of civil complaints across all code violation types.
- 
- 19 Expand focus on resources to assist property owners with clean-up efforts, including through funding assistance, cooperative efforts with Metro, and ties to community groups.
- 
- 20 Focus assistance and remediation programs to benefit low-income communities and individuals who lack the means to independently remediate violations.
-

---

**# Recommendation**

---

- 21 Explore establishment of an abatement fund that over a period of years can become substantial enough to allow the County to respond decisively in the cases of dangerous buildings or significant public health threats and when compliance is not achieved within a reasonable timeframe.
- 22 Integrate current and recommended practices into a single County-wide Code Compliance Policy and Procedure Manual.
- 

**Technology**

- 23 Develop clear, consistent county-wide protocols for standardizing the utilization of Accela across the organization.
- 24 Expand training on Accela to all staff who “touch” the system and promptly escalate any outstanding software issues to higher levels within the County and/or the software vendor.
- 25 Develop clear management reports on code compliance activities and locations that can be used for management and reporting and to investigate equity issues in more detail.
- 26 Commence process to scope out, purchase, and implement a single “report an issue” system for all County community members for submission of code complaints and reporting of other issues.
- 

**Communications**

- 27 Create a more robust central web page with clear information regarding code violations, whether they are under the Washington County jurisdiction, and what to do if they are.
- 28 Implement a code education program in multiple languages and utilize multiple media sources to reach community members and businesses that may not seek out information on code compliance.
-