Center for COMMUNITY PROGRESS

Vacant Spaces into Vibrant Places

August 2015

BUILDING A STRATEGIC, DATA-DRIVEN CODE ENFORCEMENT PROGRAM FOR GARY, INDIANA

Center for Community Progress Report to Gary, Indiana
2015 Technical Assistance Scholarship Program (TASP) Recipient

A Center for Community Progress TASP Final Report

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ABOUT CENTER FOR COMMUNITY PROGRESS

Founded in 2010, the Center for Community Progress is the only national 501(c)(3) nonprofit organization solely dedicated to building a future in which entrenched, systemic blight no longer exists in American communities. The mission of Community Progress is to ensure that communities have the vision, knowledge, and systems to transform blighted, vacant, and other problem properties into assets supporting neighborhood vitality. As a national leader on solutions for blight and vacancy, Community Progress serves as the leading resource for local, state, and federal policies and best practices that address the full cycle of property revitalization. Major support for Community Progress is generously provided by the Charles Stewart Mott Foundation and the Ford Foundation.

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INTRODUCTION

In January 2015, the Center for Community Progress (Community Progress) announced that the City of Gary (City) was one of four communities competitively selected to be a recipient of our Technical Assistance Scholarship Program (TASP).[1] The City's successful application sought a diagnostic review and assessment of the City's current data and information management systems and practices, in the context of tackling widespread vacancy and abandonment.

During an initial two-day site visit in February, Community Progress staff led a community forum on blight and vacancy and interviewed more than 20 City officials and department heads. Based on these conversations and further identification of the most pressing problems related to vacancy and abandonment, Community Progress and the City agreed to focus the scholarship assistance on data and information management systems related to housing and building code enforcement, specifically mapping the entire process of how property maintenance code violations are addressed from initial complaints to final outcomes, and using this mapping exercise to identify systemic, organizational and operational barriers to implementing a more effective, efficient, and equitable code enforcement program.

From March to July of 2015, Community Progress conducted multiple site visits to the City; hosted two legal and policy workshops with City and County partners; interviewed more than 50 City staff members, county officials, and community partners; and participated in more than 20 conference calls with the City's TASP Implementation Project (TIP) Team.[2] In total, more than 100 people were consulted throughout the process which represented a diverse array of stakeholders from both the City of Gary as well as partners from the Metro area committed to supporting this engagement and the reform of the City's code enforcement program.

This approach yielded some powerful and persuasive findings, generating strong consensus among City officials that:

1. The current code enforcement program needs to be revamped, including reforming operations, reorganizing departmental structures, and rethinking funding strategies.

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[1] For more information about Community Program and the Technical Assistance Scholarship Program, please visit http://www.communityprogress.net/technical-assistance-pages-45.php.

[2] A complete project timeline is included as Appendix A.

2. The City must shift from an exclusive reliance on criminal prosecution to more frequent use of the administrative process via the Unsafe Building Law,[3] targeting different interventions and strategies across different neighborhood markets and different types of problem properties.

3. Simple, cost-effective reforms to operations and data management practices can yield better outcomes and ensure smarter neighborhood investments.

4. Regular communication and deep collaboration across City departments should be stitched into the daily operations of governance, if not institutionalized through long-term project teams or issue-specific task forces.

This report is written for a variety of audiences in mind, some of which include but are not limited to, critical City of Gary stakeholders as well as those stakeholders from across the country who may learn from the City of Gary and its efforts to achieve innovative code enforcement reform. The report includes the following sections:

Section 1. Overview of Vacancy and Abandonment Challenges

Section 2. Setting the Stage: Current Organizational Structure and Enforcement Responsibilities

Section 3. Mapping the Process of Code Enforcement

Section 4. Findings and Recommendations

Section 5. Conclusion

Community Progress is a national nonprofit organization that works with communities across the country to develop solutions to blight, vacancy and abandonment. We are the national experts on policies, programs, and tools that address the full cycle of property stabilization and revitalization—from blight prevention, through the acquisition and maintenance of problem properties, to their productive reuse. We have provided customized technical assistance to more than 150 communities in 30 states since our launch in 2010. This project was led by Tarik Abdelazim, Associate Director of National Technical Assistance, with strong support from Lincoln J. Chandler, PhD, President and CEO, Chandler Decision Services, and James J. Kelly Jr., Clinical Professor of Law at the University of Notre Dame Law School.[4]

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[3] Under the City of Gary Municipal Code Sections 105-724 through 105-728, the City adopted the Unsafe Building Law, Indiana Code § 36-7-9 et all, by reference. Unsafe Building and Unsafe Premises are specifically defined under Indiana Code § 36-7-9-4. The law authorizes cities in Indiana to order owners of unsafe buildings, yards and lots to take corrective action. Owners that do not comply face civil penalties, liens for the cost of corrective action taken by the City and, potentially, loss of the property through a receivership sale.

[4] Brief bios for the members of the Community Progress Technical Assistance Team are included as Appendix B.

SECTION 1. OVERVIEW OF VACANCY & ABANDONMENT CHALLENGES

The City of Gary, once the "City of the Century," bears all the typical scars of former industrial legacy cities—the loss of industrial jobs and population, white flight, concentration of poverty, and decades of disinvestment. The five steel mills in Northwest Indiana used to employ nearly 100,000 residents. Today in Gary, there are fewer jobs in the manufacturing sector than the health and social services sector—and layoffs in the steel industry remain an all too common occurrence.[5] At its peak, according to the 1960 census, the City was home to 178,320. Today, the population doesn't break 79,000, which represents a 56% decline. Whereas the state of Indiana is 84.6% white, the population of Gary is nearly 84% African American. The City's median household income is $26,885 with 10.3% unemployment, compared to the state's median household income of $48,248 with 4.8% unemployment.[6] And according to U.S. Postal data, the City had a consistent rate of overall vacancy during the last 18 months at 30.2%, while the State's overall vacancy rate during the same time was 13.5%.[7]

The City, though, isn't giving up, especially under the leadership of Mayor Karen Freeman-Wilson, the City's first female Mayor and the State's former Attorney General. Since taking office in January 2012, the Mayor has made tackling vacancy and blight a top priority with some impressive results:

- Launched in September of 2012, the University of Chicago-Gary Urban Revitalization Project has tapped the creativity and enthusiasm of graduate students from the University of Chicago's Harris School of Public Policy to help with policy proposals, research, and most importantly, the completion earlier this year of a citywide survey of all properties, an initiative called GaryCounts.[8]

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[5] U.S. Census, 2009 – 2013 American Community Survey.

[6] Ibid.

[7] Source: Valassis List.

[8] To learn more about the citywide survey and explore the map and results, visit www.garycounts.org.

- In January 2014, President Obama announced that the City of Gary was included in the second round of cities to be designated a Strong Cities, Strong Communities[9] partner. The designation, which to date has been granted to only 14 cities nationally, provides Gary with a dedicated team of officials from key federal agencies (SC2 Team) that operate out of City Hall for two years and help the City access and secure major federal investments toward creating a stronger middle class and more vital neighborhoods for all.

- In May 2014, Gary secured a $6.6 million award from the U.S. Department of Treasury's Hardest Hit Fund[10] (HHF) to demolish nearly 400 abandoned and distressed residential structures, a project that is ongoing and scheduled for completion by December 2016.

- In October 2014, the $1.8 million demolition of the Sheraton Hotel, a structure adjacent to City Hall that had sat abandoned for two decades, showed the administration was determined to follow up big promises with big victories.

- In January 2015, Gary was one of only four communities competitively selected to be a recipient of Community Progress' Technical Assistance Scholarship Program.
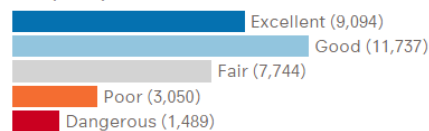
Gary survey results

58,235
Parcels surveyed

Is there a structure?
Yes (33,114)
No structure (25,121)

Property condition
Excellent (9,094)
Good (11,737)
Fair (7,744)
Poor (3,050)
Dangerous (1,489)

Public owner
City of Gary (3,093)
GUEA (578)
Department of Redevelopment (1,723)
Public Works (0)
Parks Department (1,645)
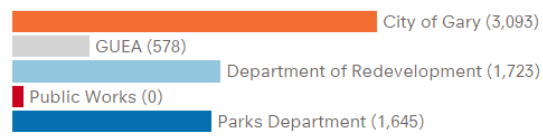
Figure 1

The above graphic represents the results of the GaryCounts citywide parcel survey, completed by the City in February 2015 in partnership with the University of Chicago's Harris School of Public Policy.

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[9] To learn more about the Strong Cities, Strong Communities Initiative, please visit http://www.huduser.org/portal/sc2/home.html.

[10] In the wake of the financial crisis of 2008, Congress authorized a number of efforts to stabilize the financial system and combat the negative impacts of the Great Recession, including the Troubled Assets Relief Program (TARP). Housing was one of the five key areas of TARP, and the two major initiatives under housing were Making Homes Affordable and Hardest Hit Funds (HHF). HHF, first announced in February 2010, provided $7.6 billion to the 18 hardest hit states, including the District of Columbia. In the spring of 2013, the U.S. Treasury agreed to approve the use of HHF by states for the demolition of blighted residential structures, and Indiana set aside $75 million to fund a statewide Blight Elimination Program. Gary's $6.6 million award represents the largest in the state.

- In June 2015, Bloomberg Philanthropies announced Gary was one of four cities selected from a very competitive, national field of applicants to receive a grant of up to $1 million to support the transformation of a key vacant downtown building into a hub for visual and culinary arts in the City.

- In August 2015, thanks to a federal grant from the Corporation for National and Community Service, the City of Gary will bring on board and support three VISTAs (Volunteers in Service to America) for a one-year term to boost the City's capacity in implementing current initiatives specific to crime prevention, blight reduction, and workforce training.[11]

The above are outstanding achievements and represent real progress, but the widespread scale of vacancy and abandonment in Gary presents severe challenges now, and likely for years to come. GaryCounts, the citywide parcel survey, provides an excellent baseline for quantifying the problem. Of the 33,114 properties with structures, only 63% were rated in excellent or good condition. There were 1,200 structures with some or significant fire damage. And what particularly stands out from the survey is that 43% of all parcels in the City are vacant, unimproved lots—a massive inventory of vacant land (common sites of overgrowth, debris, and trash) that seems all the more challenging given the sheer expansiveness of the City. A city official aptly put this dynamic into perspective: the City of Gary has the same land mass as San Francisco, but with only 1/10th the population.

When Gary applied last fall to the Technical Assistance Scholarship Program offered by Community Progress, the two key factors outlined above emerged clearly in the City's application: the daunting scale of vacancy and abandonment in Gary, and the dynamic political leadership posting gains on a focused fight against blight. In January of 2015, Community Progress announced that the City was one of four communities competitively selected to be a recipient of our Technical Assistance Scholarship Program, which provided a dedicated team of experts over a six-month period to assist the City in its efforts to more effectively combat vacancy and abandonment.

Based on the findings from our preliminary site visit in February, Community Progress suggested a slight adjustment to the scope and focus of the project. Rather than pursuing the City's original application request, which was to assess current data systems and practices and provide guidance on building a comprehensive and integrated data system,[12] Community Progress proposed mapping the process for code enforcement which would inherently focus attention on how data is gathered, managed, and shared and help identify underlying barriers or

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[11] To learn more about the VISTA program, visit http://www.nationalservice.gov/programs/americorps/americorps-vista.

[12] An outcome that is still very much likely before the end of the year thanks to an expanded team of additional experts and focused enthusiasm of city staff generated by this six-month engagement. See description of G-STADS™ on page 10.

deficiencies that would need to be addressed before the City can implement a more strategic and data-driven code enforcement program.

It was anticipated that the process mapping exercise would also raise awareness about the intersection of complex systems at play, and open up meaningful legal and policy discussions both across City departments and with key community partners about new approaches to code enforcement and new practices in data management. The process mapping exercise, in other words, was an alternative way into a far more meaningful discussion about what the City needs to do to eventually implement perhaps THE best practice: a systems-based, data-driven, market informed, comprehensive approach to vacancy and abandonment.

In addition to code enforcement, there are three key interrelated areas and systems that can greatly impact, for better or worse, a community's ability to tackle vacancy and abandonment: (a) data systems and management practices; (b) neighborhood market conditions; and (c) tax enforcement and foreclosure systems. The focus and design of this six-month technical assistance engagement—mapping out how data is shared and managed in the enforcement of code and conducting multiple legal and policy workshops—was driven largely by a desire to highlight the intersection of these systems, and build consensus for a set of forward-thinking reforms.

Mapping out the code enforcement process should help focus attention on how access to robust and inter-agency data, or the lack thereof, impacts and shapes code enforcement. Specifically, what role do data systems and sharing practices play in the City's current approach to code enforcement, and what would need to change to adopt a more strategic, data-driven approach that yields more effective, efficient, and equitable outcomes?

Mapping out the code enforcement process should help indirectly shed light on the value of understanding market conditions when trying to tackle vacancy and abandonment. Specifically, what role do housing market conditions play in driving the City's current approach to code enforcement, if at all? How might different interventions be applied strategically across different markets and different problem properties? What would need to change with the code enforcement approach if the City made a commitment to tailor preventative strategies to housing market strength, with a principled focus on equity and justice?

Finally, mapping out the code enforcement process should help uncover some clues about the effectiveness of the current approach to code enforcement when there exists such a massive inventory of heavily tax-delinquent property that sits abandoned and passed over year after year by private bidders. Specifically, are code inspectors unnecessarily and unknowingly citing abandoned properties that have been recycling through the Lake County Commissioners' annual auction? How can the City and County share and analyze key datasets to better understand and map this abandoned inventory, make more efficient use of limited enforcement resources, and perhaps even pursue some strategic acquisition and re-use pilot projects?

To set the stage, it is important to briefly review and assess current conditions in the City of Gary as it relates to these three key areas: (a) data systems and management practices; (b) neighborhood market conditions; and (c) tax enforcement and foreclosure systems.

DATA SYSTEMS

Based on our assessment, the City of Gary's data systems and management practices are typical among local governments, consisting of a patchwork of information management solutions customized to the needs of individual departments. The result is siloed data, siloed decision-making, and an overall lack of collaboration and data-sharing. The City of Gary also relies on parcel data information, such as ownership information and property tax collection and payment status, that is gathered and maintained by Lake County and other governmental agencies. This presents another set of challenges when trying to integrate, and analyze in real-time, various parcel data that are key to informing blight prevention strategies.

It was clear from our assessment and conversations with City officials, that Information Technology (IT) solutions were commonly pursued by the Department of Information Technology in a reactive manner, and without a long-term approach to managing data seamlessly across all City departments. Decisions about which software and hardware to purchase and install were usually driven by affordability. To complicate matters, federal and state authorities opened an investigation this spring into the purchase and alleged re-sale of computer products by the City's Department of Information Technology. The administration is cooperating fully, with a commitment to hold accountable those who may have abused their position of public service for private gain, but the investigation has resulted in the loss of two senior managers in a department that was only four individuals deep.

Despite these current challenges, there are reasons for optimism. For approximately a year, the Building Department has been using a sophisticated enterprise software solution, Cartegraph, which could serve as the centralized digital environment for all building inspection and code activity.

Additionally, the City is currently working with another IT consultant, Dynamo Metrics, to build the Gary Space-Time Analytics Data System™ (G-STADS™), which will be used to map existing demographic and property data. A key goal of the project is to solidify a consistent data sharing relationship with Lake County officials and municipal offices such that G-STADS™ can receive quarterly updates four times per year on all data fields, which will then be integrated into the City's enterprise GIS and used to map and spatially analyze existing demographic and property data. When fully functional, City officials will use G-STADS™ for project identification, grant writing, infrastructure improvement, performance measurement, targeted blight elimination, master planning and numerous other municipal decision making processes. Cartegraph and G-STADS, both functional with ArcGIS, will allow for seamless integration and mapping of data, dramatically improving real-time analysis and tracking of key neighborhood trends.

Finally, through this engagement, we facilitated numerous roundtables and meetings between City officials and representatives from Lake County, the City's Clerk's Office, and the Gary Sanitary District. By helping all partners understand the value of real-time data sharing in the City's efforts to combat vacancy and abandonment, we contributed to a commitment by all parties to examine current deficiencies in the regional management of parcel information and explore mutually beneficial solutions. In fact, thanks to the cooperation and follow-through by both County government and City Clerk's Office during the last few months, some small process improvements have already been made, and promising conversations now continue under the auspices of the G-STADS™ project.

MARKET CONDITIONS

In addition to comprehensive parcel data, market conditions must inform and guide a community's approach to vacancy and abandonment, particularly when it comes to code enforcement. Often, communities simply want local code inspectors to aggressively cite all violations and prosecute property owners under the full extent of the law. Local officials may even set quotas for tickets or count court cases as a measure of performance. Though the "get tough" mentality is a completely understandable response as trends of vacancy and abandonment may worsen, a City's code enforcement approach must be mindful of underlying neighborhood market conditions. **Ultimately, a property owner's decision to cure a violation and invest in repairs is an economic decision.**

For example, does it make sense to invest $15,000 in a new roof on a residential property when the prospects of ever recouping that investment from a future sale seems impractical based on slumping neighborhood market values and nearly nonexistent market activity? With so many neighborhoods in Gary underperforming or distressed, many owners with limited finances may simply walk away from a property in the face of aggressive criminal prosecution of property code violations, only adding to the inventory of vacant and abandoned properties in Gary.

Being sensitive to market conditions is especially important for the City of Gary. As shown in Table 1, the housing market has dropped steadily over the years, continuing decades of economic decline and disinvestment. The number of housing sales dropped 85% when comparing three-year activity from 2006 – 2008 to 2011 – 2013. More stark is

Table 1

Average Housing Sales Information for City of Gary and Lake County

AVERAGE # OF ANNUAL HOUSING SALES	
CITY OF GARY	
2006 - 2008	2523
2011 - 2013	375
% CHANGE	**-85%**
LAKE COUNTY	
2006 - 2008	16395
2011 - 2013	5888
% CHANGE	**-64%**
AVERAGE ANNUAL MEDIAN SALES PRICE	
CITY OF GARY	
2006 - 2008	$59,675.00
2011 - 2013	$34,716.00
% CHANGE	**-42%**
LAKE COUNTY	
2006 - 2008	$129,463
2011 - 2013	$121,486
% CHANGE	**-6%**

Source: Valassis Lists

comparing the difference of the average median sales price over multiple years between the City and Lake County. The average median sales price in Gary between 2011 and 2013 was $34,716 (a drop of 42% from five years prior), whereas homes in Lake County were selling at a median price of $121,486 over the same period.[13]

TAX DELINQUENCY AND FORECLOSURE

For most communities, tax delinquency is one of the most reliable predictors of abandonment. Unfortunately, inefficient tax enforcement systems and antiquated tax foreclosure laws can make it difficult to return a tax-delinquent property to responsible ownership and productive use in a timely manner. For these two reasons alone—though there are many more—a City should do its best to understand and monitor its inventory of tax-delinquent properties, which yield important datasets in guiding a blight prevention strategy. Similarly, *how* a municipality enforces delinquent taxes, the length of the process, and whether the process generates a clear, marketable title at the back end, (most of which is largely determined by state tax foreclosure laws) can greatly enhance or restrain its ability to tackle vacancy and abandonment.

Lake County can move a tax-delinquent property through three different types of auctions. A Tax Sale is offered approximately 18 months after taxes are due and remain unpaid, and the minimum required bid at this first sale is the full amount of taxes, interest penalties and associated costs owed. The sale involves the sale of a tax lien (or "tax certificate"), not the sale of title to the property, and grants successful bidders the power to collect the delinquent payments, or foreclose on the property if after one year the owner fails to make payment (redemption period). If at this first Tax Sale, no bids are received for a given tax lien, the tax certificates are transferred to the County Commissioners, who then have four options:

1. Do nothing.

2. Authorize and conduct a Commissioners' Certificate Sale. The only differences between this second Certificate Sale and the first Tax Sale are that the redemption period is reduced from one year to 120 days and the minimum bids may be set lower by the Commissioners.

3. Assign the tax certificate to another political subdivision.

4. Process tax certificate to tax deed and conduct a Commissioners' Deed Sale. Bidders at the Commissioners Deed Sale receive the actual deed to the delinquent properties, not the tax lien, and then generally pursue a quite title action to extinguish all claims to the property in pursuit of marketable, insurable title.

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[13] Source: Valassis Lists.

Looking at the results of recent Lake County Tax Lien Sales suggest very weak market conditions and an overall lack of investor confidence. For instance, over a six year period, the average number of properties *not* sold at the Tax Sale is close to 92%. Although these totals represent properties throughout Lake County, the overwhelming majority of delinquent properties are in the City of Gary. The TIP Team was unable to gather data on recent Commissioners' Certificate sales in Lake County, however, the City of Gary did have a copy of the full listing of properties offered at the 2015 Commissioners' Deed Sale, conducted earlier this year. The properties offered for auction in the Commissioners' Deed Sales are heavily tax-delinquent, have been passed over *at least* twice by private bidders, and could be recycling through this annual deed sale for years. This list could be viewed as one estimation of the City's inventory of properties that are dead to the market and altogether abandoned by the owner. **More than 10,700 properties in the City of Gary were on the 2015 Commissioners' Deed Sale list, which represents nearly 1 out of every 5 parcels in the City.**

Table 2

Results of Lake County Tax Lien Sales, from 2009 – 2014, as provided by SRI Incorporated, the private firm that handles nearly all tax sales in the state of Indiana.

YEAR	Parcels Certified for Auction	Parcels Paid Prior to Auction	Parcels Offered at Sale	Parcels Sold at Sale	Parcels Not Sold	Percent Not Sold
2014	21,606	2,896	15,926	630	15,296	96%
2013	7,338	2,087	4,484	1,356	3,129	70%
2012	19,950	3,826	14,980	852	14,128	94%
2011	15,229	1,417	13,284	458	12,826	97%
2010	18,178	1,835	13,000	510	12,490	96%
2009	11,034	977	8,474	204	8,270	98%

This abandoned inventory negatively impacts the City in countless ways. Not only is the City losing property tax revenue year in and year out, but these vacant and abandoned properties also drain local resources, attract crime and increase risk of arson, create safety hazards for residents, depress market values, and sap investor confidence.

In a June 21, 2014 article in the Northwest Indiana Times, State Representative Edward Clere, a Republican from downstate, acknowledged the tax foreclosure system is broken when asked about Lake County's 14,000 properties set for auction last year: "There is no reasonable expectation taxes are ever going to be paid either by the current owner or someone who buys the tax certificate at a tax sale. Those continue to accrue with additional interest and penalties, and the properties are becoming less attractive to the market as time goes by."[14]

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[14] Bill Dolan, NWI.com, Times Media Company, "Selling No-Man's Land at Tax Sale a Losing Game," June 21, 2014, http://www.nwitimes.com/news/local/lake/selling-no-man-s-land-at-tax-sales-a-losing/article_643ca255-4042-597a-9c83-e12ed220e549.html.

SECTION 2. SETTING THE STAGE: CURRENT ORGANIZATIONAL STRUCTURE AND ENFORCEMENT RESPONSIBILITIES

There are three relevant departments or divisions that are involved directly in the enforcement of property codes specific to vacant and abandoned properties: Code Enforcement, Building Department, and Board-Up and Demolition Team.

CODE ENFORCEMENT

Gary operated without a Code Enforcement Department until 2011, when City officials agreed to create and fund a six-member division in the face of overwhelming concerns about vacancy and blight in general. The code inspectors[15] were first located within the Law Office and under Supervision of an assigned lawyer. In 2014, they were relocated physically and organizationally. Currently, code inspectors are working out of what used to be a break room in the basement of the Police Department. Five of the code inspectors are funded with Community Development Block Grant (CDBG) dollars, and one code inspector is funded with General Fund dollars.[16] They are under the supervision of a Police Commander. Inspectors have no dedicated data management solution, have no access to most key parcel datasets other than what is publicly available on the internet, and function largely in a paper-based environment. There is no cell service in the basement of the police department; code inspectors must walk up about a flight and a half of stairs to receive a signal. Code inspectors have to use their own money to purchase uniforms. A badge alone costs about $65.00.

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[15] We chose to use the title INSPECTOR on the process maps since it communicated the actor better, but most community residents and City officials use the more common term 'code officer.' For these reasons, we relied heavily on the title 'inspector' throughout this report, but occasionally use the following position titles interchangeably—code enforcement officer, code officer, and code inspector—to refer to the six staff members within the Code Enforcement Division that handle the enforcement of external property maintenance code.

[16] The Community Development Block Grant (CDBG), as explained on HUD's website, "provides annual grants on a formula basis to entitled cities and counties to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons." To learn more about CDBG, one of the most successful federal-local partnerships in the last forty years, please visit: https://www.hudexchange.info/cdbg-entitlement/.

Code inspectors enforce only external property maintenance code on both residential and commercial properties. They do not conduct any internal property inspections. They are occasionally asked to enforce zoning code, though they acknowledge they are not professionally trained or well-versed in zoning code.

BUILDING DEPARTMENT

The Gary Building Department includes a Commissioner, two administrative staff, and four inspectors. The Building Department handles all building and construction codes (plumbing, mechanical, electrical, construction), and enforcement of all interior property maintenance codes. The Building Department also manages and enforces the City's rental registration program.[17] The Building Commissioner has a great deal of power and discretion, pursuant to local and state law, in ensuring properties, including unimproved vacant lots, remain safe and sanitary, and plays an instrumental role in administering and enforcing the Unsafe Building Law (UBL). The Building Department uses Cartegraph, a sophisticated software solution, has modern office space located at City Hall, and is one of the six divisions under the Commerce Department.

BOARD-UP AND DEMOLITION TEAM

The Board-Up and Demolition Team is comprised of three employees, a Demolition Coordinator and two inspectors (also called Board-up Coordinators), who report to the Director of Redevelopment, which is one of the six divisions under the Commerce Department. The Demolition Coordinator maintains his own database (spreadsheet) and extensive paper files on distressed, abandoned properties.

ENFORCEMENT COORDINATION

There has historically been a low level of coordination between these three entities, which is not unusual within many local governments. However, the last two years have seen much greater willingness and interest in reviewing, assessing and improving how each entity can contribute to a more effective and coordinated approach in tackling vacancy and abandonment, including the following examples:

1. **Unsafe Building Law (UBL) and Demolition Hearings.** For years, the Demolition Coordinator took the lead on investigating derelict privately-owned properties and preparing demolition orders pursuant to the UBL. However, since the start of this year, use of the UBL has been placed temporarily on hold by the Building Commissioner due

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[17] On December 4, 2012, Gary Common Council passed an ordinance establishing minimum standards and a registration/inspection program for residential rental housing units within the City of Gary. To date, the City's program has not been rolled-out effectively, largely because of uncertainty about the legality and sustainability of local rental registration programs created by recently passed state law, which constrains a local government's ability to regulate the rental housing market. For more information about the City's program, please see http://www.gary.in.us/gary-building-department/pdf/Rental_Registration_Fact_Sheet.pdf.

to concerns over procedural questions and better delineation of duties and responsibilities. The temporary hold has proven timely. The Demolition Coordinator and his team are heavily invested now in overseeing the demolitions of hundreds of City-owned properties with the City's $6.6 million HHF award. The freeze has also proven auspicious, since a central part of our legal and policy discussions over the last few months has been the potential benefits of using the UBL for more than just demolition orders. By coordinating more closely, the Building Department, Code Enforcement Officers and the Board-Up and Demolition Team could be making far more widespread use of the UBL.

2. **HHF Grant Award.** Preparing the grant application in the spring of 2014 involved the close coordination of staff members from all three divisions, and the City's team that meets weekly to implement the grant award ($6.6 million) involves regular participation from and engagement with staff members from all three divisions.

3. **TASP Implementation Project (TIP) Team.** Back in March, the City agreed to assemble and convene weekly an interagency project team to support the implementation of this six-month technical assistance engagement and hopefully foster a deeper level of collaboration that would persist going forward. The TIP Team has included steady involvement from a six-member core team, and is likely to evolve and expand into the City's Blight Task Force, institutionalizing a level of collaboration that will be critical to sustain in the years to come.

4. **Enforcement Team.** As part of a recent initiative, the City convenes monthly representatives from all divisions and departments that have enforcement responsibilities to identify property owners that have a troubling pattern of violating City codes. The team then makes coordinated site visits to problem properties with the goal of inspecting and citing for any and all violations under the following codes: zoning, environmental and health, building and code, traffic and criminal. Members of the enforcement team spoke favorably of this effort, and enjoy coordinating resources to address irresponsible property owners that are chronically undermining neighborhood health and safety.

SECTION 3. MAPPING THE PROCESS OF CODE ENFORCEMENT

City governments faced with widespread vacancy and abandonment often search for best practices, and with the best intentions try to duplicate success without carefully examining how current practices, operations, organizational structure, and systems might seriously undermine performance and outcome. This is understandable. These same governments are often seriously understaffed and lack the time to methodically assess current operations for barriers and inefficiencies. Even when governments do commit the time to complete thoughtful assessments of operations and procedures, specifically in the area of data and information management systems, the lack of financial resources (or lack of political support) to invest in upgrades can prove a major hurdle for implementing much needed reforms.

However, the understandable desire to do *something* in the face of worsening levels of vacancy and abandonment often means new initiatives are announced, and simply layered over inefficient and ineffective operations, policies, and practices. The root systemic causes of vacancy and abandonment may be missed entirely, and both City leadership and citizens may soon wonder why either "the problem remains unsolved" or unfairly conclude that "nothing is being done." As one code inspector stated during our first round of interviews back in February, "no matter how many tickets we write, it seems like we're spinning our wheels and getting nowhere."

For this section, we include a detailed process map to visually depict how information is collected and shared during the enforcement of code—from initial complaints by citizens to all possible outcomes. The entire process map is spread across three pages:

> Phase I: Initial Intake of Complaints
>
> Phase 2: Processing the Citation, and Preparing for Court
>
> Phase 3: Taking the Matter to Court

Included with each phase is a corresponding narrative to provide the reader additional context, help explain why "doing the same thing or more of the same thing" is not an option, and suggest the need for thoughtful consideration of some, many, or all of our recommendations, which follow in Section 4 of this report.

PHASE 1: INITIAL INTAKE OF CODE COMPLAINTS
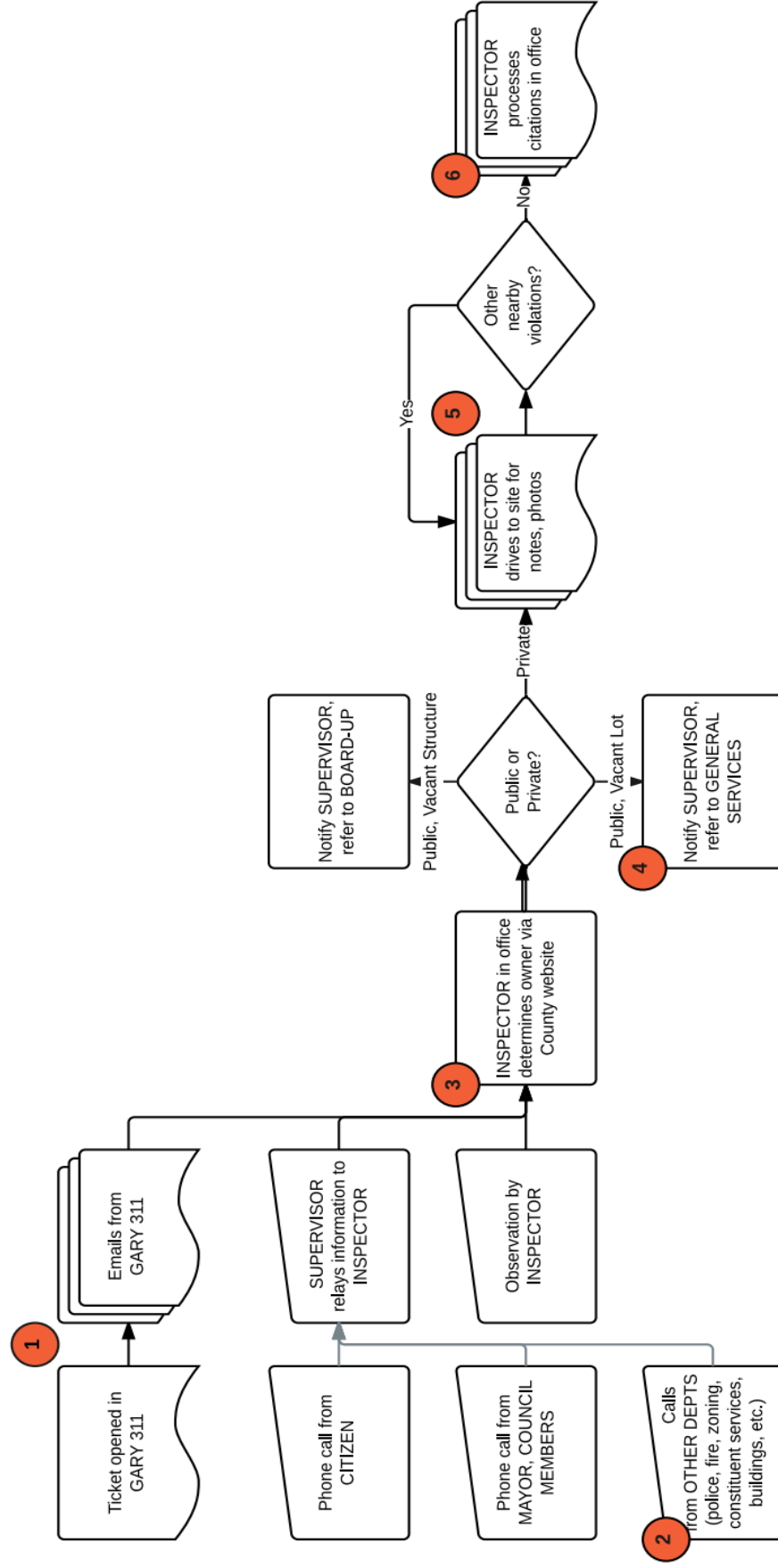
Figure 2.
Process Map of initial intake of code complaints

1 Code complaints come from a multitude of sources, as the process map indicates, including Gary 311, a service launched in 2013 to make it easier for residents to report problems and for the administration to internally track response time and performance. Through Gary 311, residents can submit code complaints in three ways: by downloading the free Gary 311 mobile phone application; by calling the Constituent Services Office, a central office for the administration to receive and route citizen complaints and requests; or by visiting the Gary 311 page on the City's website and submitting the complaint electronically.

Although Gary 311 improves communication between residents and City government and serves its purpose well as a citizen reporting tool, it is not a particularly useful or accurate measure of a code inspector's activity and performance for multiple reasons:[18]

The tickets in the system represent an undercount of the properties inspected and violations cited by the six inspectors. Most of the inspectors we spoke with confirmed that many 311 complaints lack a specific site address (for example, "a vacant lot near the corner of Franklin and 8th Avenue") or reference a property within a highly distressed area. When investigating a 311 complaint, most inspectors typically "walk a block" or at least canvass the immediately adjacent properties. One 311 ticket, therefore, can often lead to curbside inspections of multiple properties, and even more violations.

Internally generated code complaints (from Mayor's Office, Council member, Building, Zoning, or Police Department) are rarely captured in the 311 system.

When residents call the Constituent Services Office, the service representative will enter the complaint directly into the Gary 311 system. However, if a resident calls the direct line to the Code Enforcement Office (which is located three floors away from the work stations of the six code inspectors, and is staffed by the Supervisor only), the Supervisor will relay the constituent complaint via regular email or phone call to the appropriate inspector.

Based on our conversations, it appears that code inspection work[19] accounts for about 80% of an inspector's workload. They also spend a good deal of time enforcing business license renewals and the new local law requiring cameras installed at commercial enterprises that operate and remain open between 10pm and 6am.

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[18] Later in this report, we discuss and hope to make clear why counting 'the number of tickets issued' is a counterproductive metric for gauging performance and success of the code enforcement office.

[19] As used above, "code inspection work" includes all of the following: field inspections of original complaints and initial citations; field inspections for re-checks immediately before case is tried in court; field inspections for continuation cases; office and administrative work (paper-heavy); attending the court hearings.

The software itself is also limiting, and may actually introduce some inefficiencies. For example, although code inspectors are assigned to certain areas (which largely mirror council districts), every 311 ticket is routed to all six inspectors and the supervisor, creating an unnecessary level of redundancy. Also, no code inspector maintains a 311 user account. The 311 System, therefore, is simply used for intake as it relates to enforcement of property maintenance codes. It is not used for tracking the actions taken by the City to address the reported problem, or reporting back to the citizen that made the original complaint, nor does it even seem an appropriate and efficient platform to assume such functions.

2   Based on conversations with City officials, it seems code inspectors are delegated many additional tasks, assuming responsibility for zoning inspections, business license renewals, and other work as needed. It seems that many departments, which have endured staffing cuts, have turned to this newly created office of inspectors to help out with the workload. Many of these tasks might be appropriate for the Code Enforcement Office to assume, but the lack of strong managerial support and a management-level champion for the code inspectors creates some unnecessary tension and frustration among inspectors for what appears to be the assumption of work of other departments. Being moved to the basement of the police department in a former break room with no cell service also seems to contribute to low staff morale.

3   With every code complaint that comes in, the first thing an inspector does is determine if the parcel is publicly owned before driving to the site for an inspection. This is understandable, since according to the parcel survey results more than 10% of all properties in the City of Gary are publicly owned. Like many other City employees, the inspectors rely on the Lake County Assessor online portal to access parcel information and determine ownership. The assessor portal, however, does not provide real-time information, and could be outdated by a few months. Nor can the inspectors access tax information in any efficient or reliable manner, which presents a challenge. According to the 2015 Commissioner Deed Sales list, which includes all properties that are *at least* two years delinquent and that have received no bids in two prior tax sales, of the 10,719 properties in the City of Gary, 6,583 are vacant, unimproved lots. In other words, inspectors and the City's law department are unknowingly wasting hundreds of hours annually inspecting and enforcing code on privately-owned, tax-delinquent vacant lots that have been altogether abandoned—which helps explain the huge number of no-shows in court.

4 If the inspectors determine the vacant lot is owned by the City or another related public entity (such as the Parks or Redevelopment Commission), almost all inspectors simply report this to the Supervisor but there is variation in how this information is communicated:

Some inspectors still carry out a field inspection and photograph the City-owned site to document that the complaint was properly investigated. These inspectors then provide the field photo and a note to the Supervisor, assuming that a work order will be consistently directed to General Services for assistance (mow high grass and weeds or remove debris). Since these are relayed usually via phone calls, there is no way to track and measure if and when the complaint is ever resolved. There is no report back by General Services as to if or when the violation (high weeds or debris) was addressed.

Some inspectors communicate this to the Supervisor verbally, who apparently writes down the address of the City-owned lot in need of service, and there is an assumption by the inspectors that the work order will be consistently directed to General Services for assistance. Since these are relayed usually via phone calls, there is no way to track and measure if and when the complaint is ever resolved. There is no report back by General Services as to if or when the violation (high weeds or debris) was addressed.

It appears that the remaining inspectors print the screen from the Lake County Assessor's database, verifying City ownership, and then deliver this with a copy of the email complaint to the Supervisor, assuming that the work order will be directed to General Services for assistance. Since these are relayed usually via phone calls, there is no way to track and measure if and when the complaint is ever resolved. There is no report back by General Services as to if or when the violation (high weeds or debris) was addressed.

If the complaint is logged against a publicly-owned property with a structure that needs to be secured, boarded-up or demolished, the inspectors handle the complaint in a similar manner, although for these, a work order is informally directed to the Demolition Coordinator, who works under the supervision of the Director of Redevelopment and has two inspectors to help with boarding-up and securing the property. As seen with work orders passed along to General Services, there is no way to track and measure if and when the Demolition team resolves the complaint, and there is no report back by the Demolition Team as to if or when the violation was addressed.

5 Inspectors use paper pads as they move from the office to the field, and hand-write notes from each site inspection. As explained above, an inspector will almost always carry out curbside inspections of immediately adjacent properties to the property

that was the source of the original complaint.[20] Some inspectors will walk the entire block, which means one code complaint can often result in multiple property inspections, none of which are captured in the 311 system or any other integrated database. Inspectors will photograph any violations with a standalone point and shoot camera, and could return to the office with dozens of photos that need to be downloaded to their workstations and printed out, in color, as supporting documentation to the citation notice.[21]

6 Inspectors return to the office toward the end of the day to process citations. More details about processing the violations will be discussed in the following Phase 2 Process Map narrative.

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[20] Code inspectors, who only handle external property maintenance code, are not allowed to walk on the property, unless given permission by the owner.

[21] There is the potential to dramatically increase productivity and improve service delivery if the code inspectors had notebooks or tablets that were always remotely integrated into a backend, cloud-based software solution, which some of the most forward-thinking communities are now using. Fortunately, the Gary Building Department has a sophisticated software that could be customized to meet this need, which figures centrally into our recommendations.

PHASE 2: PROCESSING THE CITATION, PREPARING FOR COURT
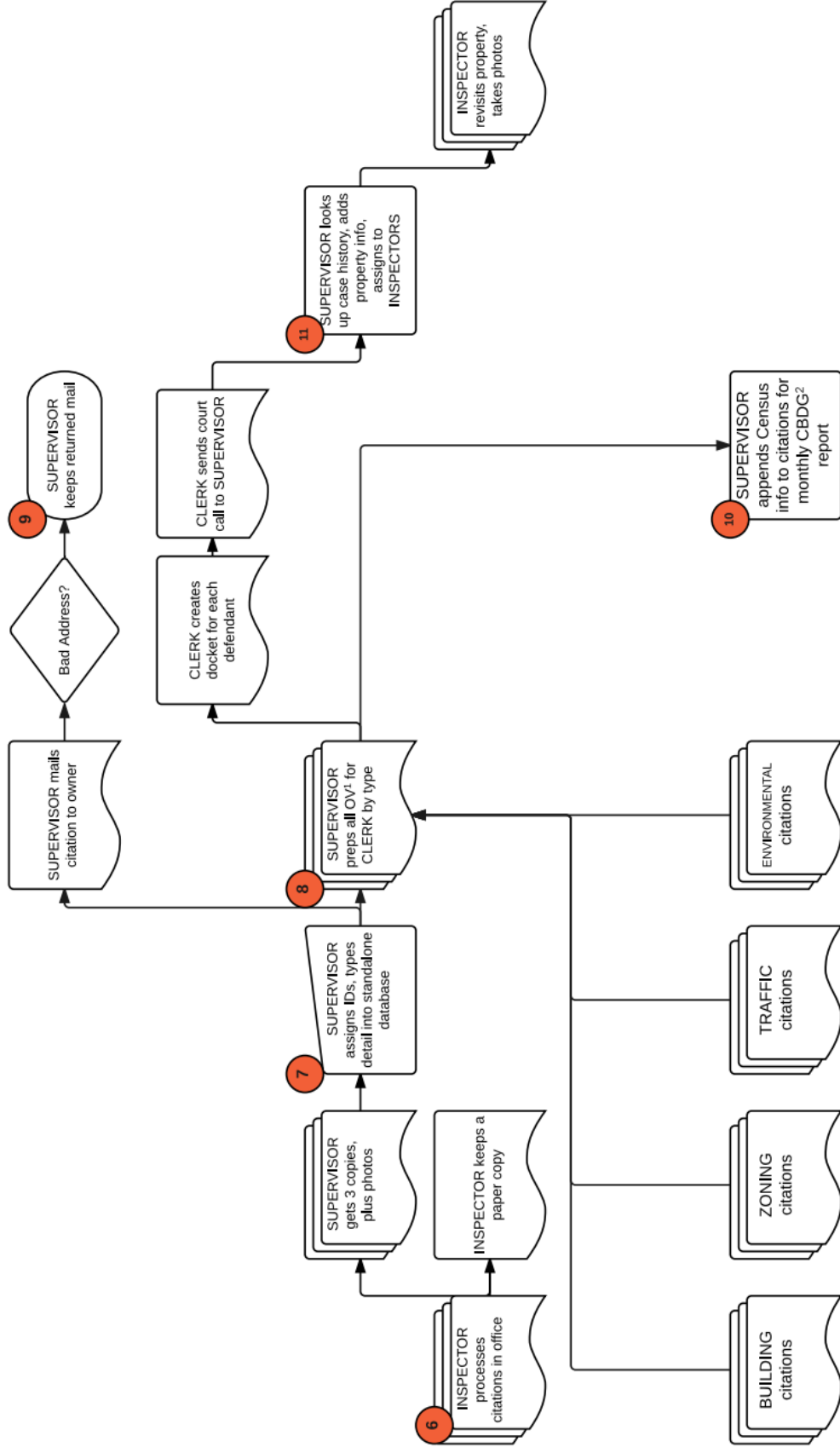
Figure 3.
Process map, processing the citation and preparing for court.

[1] OV: Ordinance Violation
[2] CDBG: Community Development Block Grant

Process flow elements:

- INSPECTOR processes citations in office (6)
- SUPERVISOR gets 3 copies, plus photos
- INSPECTOR keeps a paper copy
- SUPERVISOR assigns IDs, types detail into standalone database (7)
- SUPERVISOR preps all OV[1] for CLERK by type (8)
- SUPERVISOR mails citation to owner
- Bad Address?
- SUPERVISOR keeps returned mail (9)
- CLERK creates docket for each defendant
- CLERK sends court call to SUPERVISOR
- SUPERVISOR looks up case history, adds property info, assigns to INSPECTORS (11)
- INSPECTOR revisits property, takes photos
- SUPERVISOR appends Census info to citations for monthly CBDG[2] report (10)
- ENVIRONMENTAL citations
- TRAFFIC citations
- ZONING citations
- BUILDING citations

6 Let's assume the following scenario: an inspector receives via email two 311 tickets in the morning of two separate vacant properties with broken windows on Hypothetical Street. The inspector verifies both are privately owned, and later that morning drives to Hypothetical Street. The inspector ends up inspecting the two properties reported and 13 additional properties in the immediate block and a half area. Five of the properties were cited for a single violation. Three properties were cited for two violations. At the remaining seven properties, no violations were observed. Anywhere from 2 – 4 photos were taken for each violation, so we can assume an average of three photos per violation.

Here is a summary of the hypothetical scenario:

- 15 properties inspected
- 8 properties found in violation
- 11 citations were documented
- 33 photos were shot

The inspector returns to the basement of the police department, and starts completing the necessary paperwork. For each citation, the inspector will complete and print the standard fillable PDF Citation Form (CF), a slight improvement over the old handwritten "triplicate forms." Each CF requires manual entry (which allows for a lot of error) of the following data points:

a. Parcel address (street number and street name) – Captured from officer's notes
b. Parcel ID# – Captured from Lake County Assessor's online database[22]
c. Owner's Name and Mailing address – Captured from Lake County Assessor's online database
d. Section of the Code that the owner violated (for example, "Sec 18.06") – Captured from City code, and most inspectors reference a copy of the old triplicate form
e. One phrase description of the violation (for example, "Illegal dumping")
f. Assigned court date (at least 30 days out, but usually no more than 50 days out)

According to this scenario, the inspector completes 11 CFs and prints 4 copies of each CF, for a total of 44 printed pages. The inspector then downloads all photos from his/her camera to a computer, and prints out all 33 photos (color). Some inspectors print multiple photos on one page, others print one photo per page, which means up to 33 more printed pages. Inspectors have acknowledged that, on rare occasions, they may lose track of which photos go with which property.

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[22] The TIP Team, as it works to build out G-STADS™ (see page 5), has agreed that the PID#, which is geo-specific to a parcel, will serve as the universal identifier across all datasets. So long as any dataset collected and maintained by any City or County agency includes the PID#, the information can be easily joined, integrated, and mapped to allow for dynamic neighborhood and parcel analyses.

The inspector will paper clip together 3 copies of the CF, all appropriate photos, and a print-out of the 311 ticket (if applicable), and these documents constitute the packet that is handed to the Supervisor. Based on this scenario, the one inspector would hand the Supervisor 11 individual packets, which could total up to 77 pages.

7 The Supervisor receives all citation packets from the code inspectors, and manually enters the data from the CF into a standalone database that resides on her workstation computer.[23] The database is a Microsoft Access template that was provided by the U.S. Department of Housing and Urban Development ("HUD"), and serves as the City's only source of current and historical code activity. She manually transcribes all of the data from the CF, including mailing address, PID#, street number and address, violation (section from the code and brief description), date of inspection, court date, and inspector's initials. She also assigns to each citation a six-digit "case number" to fulfill the requirement by the City Clerk's Office. The Supervisor decided some time ago to use the middle numbers in the PID# as the six-digit case number. Microsoft Access won't allow a duplicate case number, so she had to devise a work-around solution for properties with multiple violations and citations. For example, she would use the following notation for three violations at one property: 140-318; 140-318(1); 140-318(2). If a property is cited months later, the Supervisor must try and try again adding a new parenthetical suffix until the system finally accepts it. Unfortunately, the Clerk's Office (either because of policy decision or limitation of hardware) will repeat the same six-digit case number (410-389, 410-389, and 410-389).

Following the process from initial intake to criminal prosecution, we already see at this point that there is no single identifier used to track code enforcement activity. A complaint that comes in through the 311 system is assigned a ticket number by the 311 system. This number is never referenced or used again. If the complaint submitted via Gary 311 generates an actual citation, then the Supervisor assigns the citation a six digit case number to comply with a request by the Clerk's Office. The Clerk's Office doesn't always use the same number. On the actual court docket, there is another unique "case number" used by the courts that is clearly defined by some state regulations or preset County Code. It would be ideal to maintain the same case number throughout, or at least ensure one common identifier (PID# would be ideal) throughout to allow for joining datasets later.

8 This point in the process becomes a major bottleneck, with the Supervisor having to process and prepare *all* City ordinance violations for the courts and manually enter code enforcement data multiple times in different Excel spreadsheets for alleged

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[23] If the Supervisor's computer crashed, the City could lose this database and all code enforcement activity. This standalone database should be housed on a City server, and backed-up daily if possible.

reporting purposes. The amount of paper work that flows through this employee is almost inconceivable. The inefficiency of this process creates a very real barrier to processing citations in a timely manner, as all parties acknowledged that some citations that inspectors originate are actually "held back for months" before passing along to the Supervisor because she is understandably unable to process the volume of citations.[24]

As noted above, the Supervisor does not handle just code enforcement citations. She processes and prepares all local ordinance violations that proceed to court, including those generated by Traffic, Environmental and Health, Zoning, and Building. Unfortunately, the citations come in all different forms and varying degrees of legibility (she receives copies of parking tickets from the Police Department, the pink sheet from triplicate forms from a few of the other departments, and the CFs from code inspectors). She must manually transcribe all of these into separate spreadsheets by category, as directed by the Clerk's Office. For example, she gathers the CFs for the Clerk's Office, then prints and places on top a spreadsheet summarizing the CFs and a brief memo. She then does the same for the traffic violations: bundles together the traffic tickets (or appropriate colored page from the triplicate form), prepares and prints a spreadsheet itemizing the violations, and places this spreadsheet summary and a brief memo on top of the bundle for delivery to the Clerk's Office. In other words, she could deliver to the Clerk's Office four different bundles for every scheduled court date—each bundle representing its own category or kind of ordinance violations—and each with its own summary spreadsheet and memo as directed by the Clerk's Office. Lacking access to a central server, the Supervisor must resort to storing all of these spreadsheets on her computer, again introducing the risk of losing this information if her computer experiences significant damage or infection.

9 Many citation notices come back undeliverable. For example, of the 70 citations mailed in March, about 25 came back undeliverable (about 36%). The Supervisor acknowledged she simply has no time to process these nor follow-up with the Lake County Assessor's Office to report bad addresses, an understandable limitation given she must commit so much time to move all ordinance violations through a very inefficient process.

10 It is very common for cities that receive CDBG, an annual entitlement grant from HUD, to allocate some of the grant dollars to fund code enforcement activity. Gary is no different, and uses CDBG to fund five of the six code inspectors. All

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[24] For example, a citation that was issued by a code inspector in August first appeared on the March court call specifically because more urgent citations and cases were prioritized for processing. When asked what defined urgent, the response was the source of the complaint: priority cases are those that came from the Mayor, a Council member, or through the 311 system. This is not the fault of the employees, but rather the fault of an inefficient process and a code division that receives insufficient support in trying to understand and resolve a number of operational challenges and limitations of existing information management systems.

CDBG expenditures must be documented, and the City's Community Development Division is responsible for management of these HUD grants. To comply with CDBG reporting requirements, the City's Community Development Division has the Supervisor submit a monthly report on all code enforcement activity. The Supervisor will use her Access database to copy and paste most of the relevant data into another separate Excel spreadsheet. However, there is still a good deal of editing she must do. For example, she has to query every single address via the internet to find out the Census Tract number to ensure the enforcement activity is being done in a CDBG-eligible census tract. She also strives to include in this CDBG report the actual court outcome, but it has been a challenge to receive final disposition summaries in a timely manner from the Clerk's Office. The Supervisor submits a monthly report and annual report to the CDBG Division to provide them the information necessary to report to HUD via their online reporting system (IDIS) and the Consolidated Annual Performance and Evaluation Report (CAPER). Much of this reporting could be streamlined or reduced in frequency while still complying with HUD Program regulations, more of which will be discussed later in this report.

11 From the spreadsheets and summaries provided by the Supervisor, the Clerk's Office will generate the court call, which is a listing of all cases scheduled to come before the judge and includes the following datasets: the violation, the court docket number, and the defendant's name. Because the Court Call lacks property addresses, the Supervisor must go back and reference her own database and match by the owner's name, which could pose a problem if the defendant owns multiple properties. She then manually writes the property address on the Court Call for each case, adds the name of the responsible code inspector, and then hands this paperwork to the code enforcement team so they know which properties to recheck in preparation for court. We heard varying accounts of when the court call is prepared and available for review. The Supervisor and a code inspector mentioned that they occasionally receive the court call the day before or the morning of court, which makes it very difficult for code inspectors to prepare and conduct re-checks (and take photos). However, an inspector in the building department who regularly brings violators to court mentioned that the court call is generally available a couple days before court. Some good news to report: because of discussions initiated between Clerk's Office and the City about this project and data management, the court call now includes property addresses—a simple fix by the Clerk's IT Office that saves the Supervisor approximately an hour each week.

PHASE 3: TAKING THE MATTER TO CRIMINAL COURT
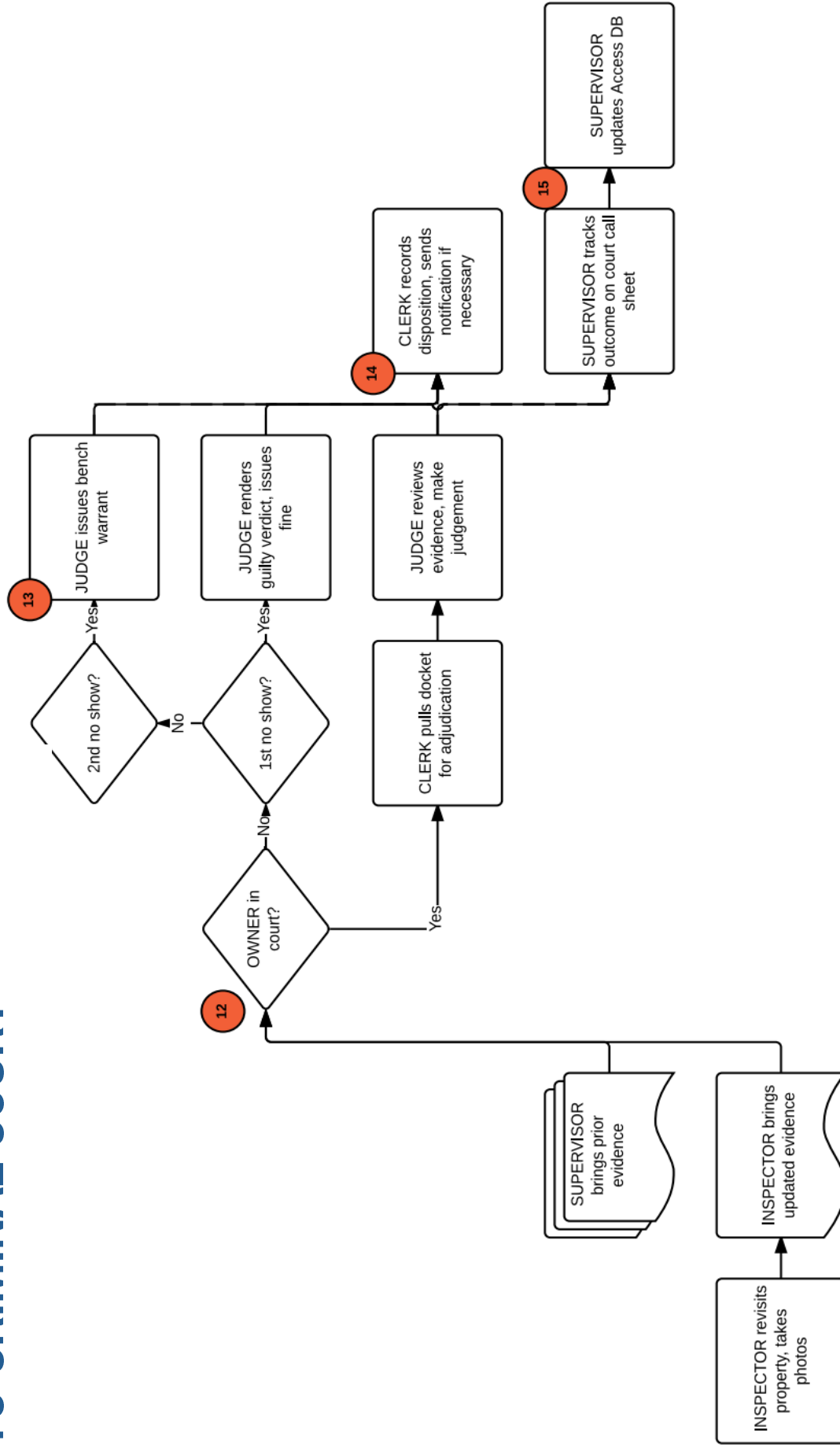
Figure 4.
Process map, taking the matter to criminal court.

12 Every code violation, no matter the offense, results in a criminal citation and is steered through the City Courts. According to accounts from Gary's lawyers and code inspectors, the majority of property owners notified do not ever appear in court. Of those who do, many are unclear of both the violation and what must be done to correct the violation because the citation notice is lacking in detail. As mentioned previously, the notice only includes the relevant section of the property maintenance code and a very brief phrase. For instance, 91 violation notices were mailed in CY2014 citing "Section 105-298" and stating, "Owner responsible for maintenance of entire property." For some responsible owners who want to do the right thing, the lack of clarity in the citations contributes unnecessarily to the delay in correcting the problem. Finally, according to the law office, some cases are "thrown out" and dismissed by the judge because the citation was grossly inaccurate or incomplete.

13 A failure to appear in court twice results in the issuance of a bench warrant. Our experience shows that bench warrants for property maintenance violations are often not effectuated because of the costs and time required to personally serve the warrant and arrest the violator, particularly when the property owner is out-of-state or where the property owner is a corporate owner (LLC or otherwise). For most communities struggling with vacancy and blight, the issuance of the bench warrant represents the last step in the frustrating, lengthy, and largely ineffective approach to criminally prosecute irresponsible property owners for code enforcement violations.

14 The Clerk's Office is responsible for collecting fines and fees on behalf of the Court and the City of Gary, and remits payments on a monthly basis. We were unable to fully understand the information management systems used by the Clerk's Office to track cases and handle billing and collections, but we did learn from the Clerk's Office that they have a similar challenge with valid mailing addresses. A multi-agency work group may want to explore the process of how deeds are transferred and recorded, as there may be a process gap or loophole that undermines the integrity of this critical parcel dataset.

15 The Supervisor does her best to manually jot notes on outcome for each case on her court call, which she then files away for reference after adding any relevant data to her Access database. She will also go back to the appropriate CDBG monthly report, which was already submitted to the Community Development Division, and note outcomes for each case. As mentioned above, the Supervisor regularly requests a full report of dispositions from the Clerk's Office, but does not always receive them in a timely or consistent manner.

SECTION 4. FINDINGS & RECOMMENDATIONS

The value of the process mapping exercise was more than the sum of its parts, as the focused discussion with front-line staff and senior managers across departments was a unique opportunity for City officials to pause and thoughtfully reflect on the small details that can often go overlooked at a time when understaffed governments seem to be in perpetual crisis mode. Though Community Progress led the analysis and brought expertise to bear on the mapping exercise and the legal and policy workshops, a tremendous amount of credit goes to the City of Gary staff who participated, shared, and engaged with us. The residents of Gary are fortunate to have an administration full of dedicated public servants who, throughout this engagement, were candid and thoughtful about deficiencies in the process, limitations of policy expertise, and their own anxiety caused by the prospect of change. But consensus emerged that change is needed. This consensus offers clear evidence of the genuine desire of City staffers to help stem the tide of vacancy and abandonment and make meaningful contributions toward achieving a better City of Gary.

This section is presented in three parts: (i) powerful evidence illustrating the ineffectiveness of the City's current code enforcement approach, (ii) recommendations for process improvements, and (iii) policy recommendations.

THE CURRENT PROCESS IS NOT WORKING

Key findings from the process mapping exercise and the legal and policy workshops are summarized in Table 3, but it's worth trying to answer some of the questions posed in Section 1. In sum, is the City's current approach to code enforcement effective, efficient and equitable, and how does code enforcement intersect with data systems, market conditions, and tax enforcement and foreclosure systems?

In addition to the evidence uncovered by the process mapping exercise that suggests the process is inefficient, a one-time analysis of available datasets and anecdotal accounts from the City Law Department generate some strong evidence that the current approach to code enforcement is also neither effective nor equitable.

A-HA! MOMENT #1:

Lake County's 2015 Commissioners Deed Sale List included 10,719 properties with addresses listed in the City of Gary. We had hoped to analyze the past three years of Commissioners Deed Sale lists to determine exactly how many properties have been recycling through this annual auction, but we were unable to collect the necessary datasets. In the absence of multiple years, we were still able to join the 2015 Commissioner Deed Sales list to other datasets for analysis to answer whether the code enforcement officers are being deployed efficiently and generating positive outcomes.

With the help of the GIS Manager for Gary Sanitary District, who was a tremendous help to this project, Community Progress cross-referenced all code citations in 2014 (Excel spreadsheet) with the 2015 Commissioners Deed Sales list (Excel spreadsheet). The properties on the 2015 Commissioners Deed Sale List are *at least* two and a half years delinquent on taxes, and as discussed previously, one might assume this list is a good estimate of the City's abandoned inventory. The goal was to determine how many times code inspectors cited these tax-delinquent properties during the calendar year in 2014, generating an estimate of the hours and dollars expended by inspectors, lawyers, the Clerk's Office and the courts, on properties that already exhibit clear signs of abandonment.

Of the 2,190 citations issued in CY 2014 by inspectors, 798 of these were issued on likely-abandoned properties included in the 2015 Commissioners Deed Sale List.

> That means about 37% of all code enforcement activity in 2014 was generally 'wasted' on 'dead properties' that had been tax-delinquent for at least two years and had attracted no private market interest from at least one tax lien sale and one tax commissioner sale. Based on personnel costs for the Code Department and the Law Department provided by the Finance Department, this amounts to at least $85,000 expended on ineffective inspection and criminal prosecution of violations because of poor data-sharing practices and siloed operations.

Based on conversations with City officials, it is likely that since September of last year, the inspectors have also been ticketing HHF properties, an unreasonable expenditure of hours and dollars on properties that will be demolished by the City within approximately one year.[25]

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[25] During our April site visit, in talking with the code inspectors, we learned that none of them had access to the list of properties slated for demolition as part of the City's HHF grant award. We shared this with the TIP Team, and there was agreement to generate spreadsheets of HHF properties by district with associated maps and distribute these to the code inspectors with the directive not to inspect or cite HHF properties going forward. The point is that some of the simplest, cost-effective data-sharing practices can yield big returns, but open and consistent

The above findings help explain why more than half of all owners cited do not show up for court, why more than 30% of all mailed citation notices come back undeliverable, why the bench warrant list continues to grow, and why the one code inspector feels like he's "spinning his wheels."

To be very clear, and repeat again: this isn't the fault of the code inspectors. The glut of abandoned properties that recycles through the annual Commissioners Deed Sales, and which represents almost 1/5 of all parcels in the City, needs to be acknowledged, not ignored. Clear policy directives need to be provided to the code inspectors on what to do with this massive inventory of abandoned property. Better data-sharing and analysis needs to guide resource allocation and enforcement approaches. And most importantly, an alternative to the criminal prosecution of all code violations needs to be integrated into the City's approach to vacancy and abandonment.

A-HA! MOMENT #2:

In conversations with staff members from the City law office, we asked them to provide a general accounting of what happens in court each month, and to provide some estimates based on the assumption of 100 citations mailed by the Code Enforcement Office. Their approximations are captured in Figure 5 below.
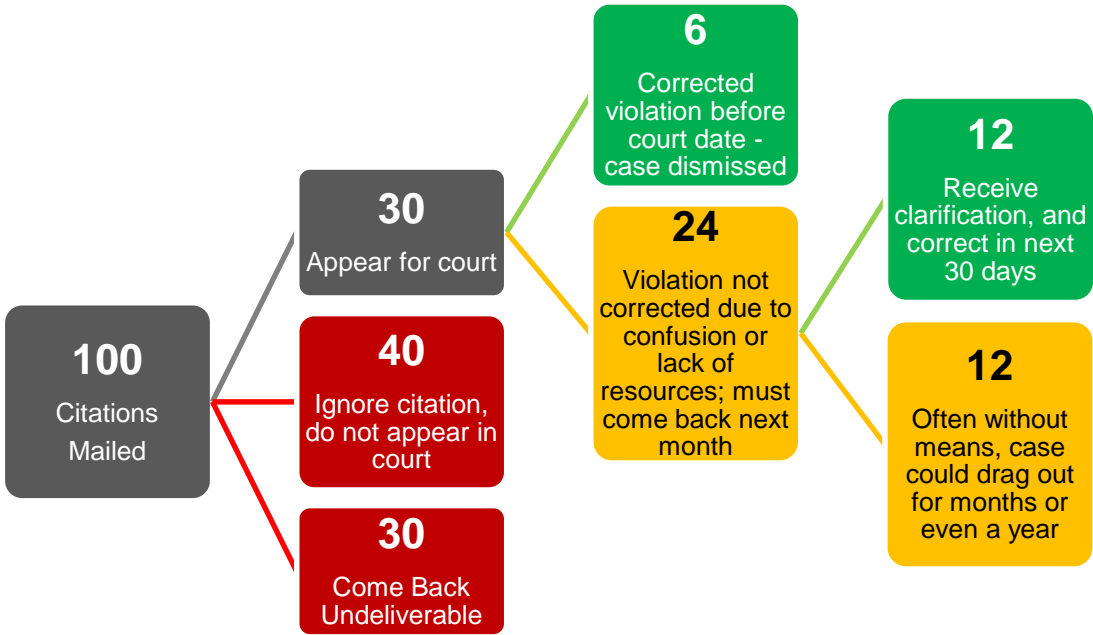
Figure 5

Assuming 100 citations mailed in a given month to property owners by the Code Enforcement Office, the above is an estimation from City lawyers of the typical outcomes from relying on criminal prosecution of external property maintenance code violations.

communication across departments—as well as a strong and genuine commitment to teamwork—is needed to identify these opportunities.

The City's approach is not effective. According to estimates by the City lawyer, only about 6 out of every 100 owners cited for violations correct the problem within 30 days. The other 24 who actually show up in court either request clarification on what needs to be done because the citation language was vague, or admit they lack the resources to fix the problem and request more time. Of these 24, about half will have completed the work one month later, at their second court appearance. The remaining 12 property owners are generally seniors or low-income owners that lack resources, mobility, or knowhow, and can keep coming back for months on end until issue is resolved, all the while amassing fines and fees for failure to remedy the original violation.

> In sum, only about 6% of all violations on privately-owned properties cited by the code inspectors are corrected within 30 days. This 30-day compliance rate could triple, according to the figure above, if the citations clearly explained what the exact violation is and what the owner should do to fix it.
>
> By relying almost exclusively on the criminal prosecution of property owners for violations of property maintenance code, the City is not only committing a tremendous amount of hours and dollars for minimal impact, but the individuals fined are often responsible owners, many of whom are 'legacy residents,'[26] trying to do the right thing but usually either without clear understanding of the problem and how to fix it or the financial means to do so.

Such a process is not equitable. Many out-of-state property owners or limited liability corporations may likely ignore citation notices, knowing that the City lacks the resources to personally serve bench warrants or follow-up with any other enforcement mechanism that could eventually result in foreclosure or loss of the asset. Moreover, the aggressive criminalization of property violations is not well-suited to the City's high level of poverty and distressed housing markets. Simply ordering code inspectors to cite more violations may likely prove counterproductive, with some property owners of limited means deciding it makes more economic sense to abandon a property than sink thousands of dollars into new repairs. For all the reasons above—and by no means specific to Gary, Indiana—Community Progress generally encourages communities with widespread levels of vacancy and abandonment and distressed markets to move away from a code enforcement approach that relies heavily on criminal prosecution of property owners.[27]

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[26] Gary Mayor Karen Freeman-Wilson has coined this term to describe the proud, responsible residents that have endured decades of disinvestment and neighborhood decline, but continue to call Gary home.

[27] Center for Community Progress, S. Toering and F.S. Alexander, "Judicial In Rem Code Enforcement and Judicial In Rem Tax Sales: Optimum Tools to Combat Vacancy and Abandonment in Atlanta," 2014,

Table 3
Summary of key findings from the six-month technical assistance engagement.

	KEY FINDINGS
1	The Code Officers operate without strong guidance, rely almost entirely on a paper-based inefficient process, have no access to historic enforcement activity or other relevant city datasets, lack an invested department head to champion for their needs, and carry out tasks absent any strategic direction or cooperation from other departments.
2	The deployment of code enforcement resources is being guided by politics and a 'get tough mentality' that measures success by number of tickets issued, instead of being driven by data, markets, and integrated within a more comprehensive approach to neighborhood revitalization.
3	The City relies almost exclusively on criminal prosecution through the courts for all code violations, a process that is ineffective, inefficient and inequitable (often end up punishing just the 'legacy residents' who want to do the right thing).
4	The Code Enforcement Coordinator/Supervisor is saddled with an incredible amount of time-consuming data management (some of it unnecessary and redundant) because of the "silo" work culture and mentality, lack of communication and cooperation between relevant partner departments and agencies, and poor to non-existent enterprise planning by City's former IT Director and staff. This Coordinator also prepares EVERY ordinance violation, not just those generated by code enforcement officers, for the City Clerk and Courts.
5	Code Enforcement Officers handle only external property maintenance code, but also enforce zoning and business licenses.
6	The source of funding for code enforcement officers (Community Development Block Grant or General Fund) has resulted in a very cautious and ultimately inefficient deployment of resources across neighborhoods.
7	The Unsafe Building Law is narrowly utilized as a tool to address blight, almost exclusively being used to carry out demolitions by the Redevelopment Commission. Use of UBL has been temporarily and smartly halted by the Building Commissioner until the process is fully reviewed, improved and made consistent with local and state laws.
8	The Building Commissioner has a lot of powers and discretion in holding property owners responsible to create safer and healthier neighborhoods.
9	The Building Department has a sophisticated but underutilized off-the-shelf enterprise software, an engaged department head, and a professional and experienced staff.
10	The "Enforcement Task Force," a year-old initiative that brings law, building, code, zoning, and environmental enforcement officers to the same nuisance property, is a good approach and based on feedback from some task force participants is a welcome and much needed level of coordination.

http://www.communityprogress.net/judicial-in-rem-code-enforcement-and-judicial-in-rem-tax-sales--optimum-tools-to-combat-vacancy-and-abandonment-in-atlanta-pages-479.php.

PROCESS IMPROVEMENTS

Before recommending policy options the City might consider to achieve a more strategic code enforcement program, we highlight some key gaps and deficiencies that emerged during the mapping exercise. Addressing these will result in a more efficient process, which is critical since this will serve as the foundation upon which a more strategic approach will be built. We identify five process needs, three of which have already been addressed to some degree over the last two months.

REPORT OUT FROM ONE DATABASE

In the absence of a better system or method, the Code Supervisor is generating multiple spreadsheets/reports for different parties, and cutting and pasting enforcement activity and cases from one spreadsheet to another, adding unique columns and even looking up data points online for the CDBG report. The Supervisor's standalone database (Access) should be customized to include the data fields from all reports, which would allow her to report out only the data fields needed for each party.

> **Progress:** *The GIS Manager for the Sanitary District has built an improved database for Code Enforcement that will reduce the time needed to generate the reports to CDBG and the Clerk's Office, and allow for easier data joining and analysis. This new database should go live before the end of the year.*

SHARE CRITICAL PROPERTY LISTS WITH INSPECTORS

Code inspectors are unknowingly citing properties that are abandoned or slated for demolition under the City's HHF grant project, wasting a considerable number of hours and dollars that could be directed and invested more strategically. The Redevelopment Department and Planning Division should be communicating more frequently with code inspectors, specifically sharing relevant and updated property datasets whenever possible.

> **Progress:** *Members of the TIP Team created lists of HHF properties by district, and shared these datasets and associated maps with all code inspectors midway through this engagement. A similar effort is underway with heavily tax-delinquent properties that are recycling through the annual Lake County Commissioners Deed Sale auction. Until the G-STADS™ system goes live, the City will need to generate reports semi-annually to ensure these tax-delinquent property lists are accurate.*

CONTINUE DIALOGUE WITH CLERK'S OFFICE

This engagement opened up some meaningful discussions between City officials and Clerk Office representatives about how improving the process and data-sharing practices will benefit both parties. The City should work with the Clerk's Office to add property addresses to the Court Call to eliminate inefficiencies and chance for error, ensuring the PID# is attached to all cases/citations to allow for spatial analysis, and developing a more timely and efficient way to share dispositions in order to reliably measure outcomes and comply with federal reporting requirements.

> **Progress:** *The Clerk's Office already responded to the City's request to include the property address on the Court Call—a small, easy fix that saves the Supervisor nearly an hour a week—and remains engaged in discussing new ideas with the City.*

CLARIFY LANGUAGE IN CITATIONS

Every month, responsible property owners who want to do the right thing show up in court to find out what the problem is and how to fix it because the citation form was vague and lacking in detail. If owners want to responsibly fix the problem in a timely manner, the City should be doing everything possible to make that happen. Since the volume of citations will go down if the City adopts some of the policy options discussed below, there is no reason for inspectors not to spend the extra time to clearly spell out in the initial citation the nature of the violation and how to fix it.

The City might also consider having one of the VISTAs develop some Code Enforcement 101 Guides for Citizens, and posting these online and distributing throughout the community to raise awareness of the ten most common violations and how to fix them. Given that three violations (high weeds, unsafe accessory structures or sheds, and unnecessary storage and debris) accounted for 63% of all citations issued by code inspectors in the calendar year 2014, such resource guides could prove very effective and helpful to residents who want to address a violation in a timely manner.

UNDELIVERABLE MAIL

Currently, citations that come back undeliverable are stored in a box, yet the violation still proceeds to City Court. The City should render a policy decision on whether or not undeliverable citations should even be added to the docket for court, since it raises questions about constitutionality of notice and the merit of committing staff and court resources to inevitable no-show cases.

POLICY RECOMMENDATIONS

If the City hopes to build a more strategic code enforcement program that is part of a comprehensive approach to vacancy and abandonment, the findings above point to the need to do more than just address deficiencies in data systems and management practices through process improvements. With a deeper understanding of the underlying dynamics and intersections with neighborhood market conditions and the tax enforcement and foreclosure system, the City must also be willing to revamp the code enforcement program entirely. We provide key policy recommendations below and in summary form in Table 4.

REORGANIZATION – RELOCATING CODE ENFORCEMENT TO BUILDING DEPARTMENT

The inspectors operate without strong guidance, rely almost entirely on an inefficient, paper-based process, have no access to historic enforcement activity or other relevant City datasets, and carry out tasks independent of strategic direction by and coordination with other departments. Nearly all of these problems can be addressed by relocating the six code inspectors to the Building Department and placing them under the supervision of the City's Building Commissioner.

This organizational reform brings all code enforcement activity into a sophisticated digital environment, opens the door for cross-training to allow for more strategic and flexible deployment of City inspectors, and dovetails with the City's interest to explore utilizing the Unsafe Building Law (UBL), instead of the criminal citation system, far more frequently going forward to obtain repairs of vacant properties and maintenance of vacant lots. Since the UBL requires the City's Building Commissioner, as the enforcement official, to issue an order requiring action by the owner before any enforcement action can take place, it is imperative that code inspectors shift into the same office and have access to the same digital environment that the Commissioner currently uses to track UBL demolition orders.

ENFORCEMENT ACTION – EXPANDING THE USE OF UNSAFE BUILDING LAW

The City uses Gary City Court as the first stop for the owners of problem vacant properties, an approach that taxes legal resources, punishes those who appear in Court, creates a backlog of bench warrants for those who do not, and provides little or no leverage against those who live far away from Gary. Coupled with the current organizational structure and lack of data sharing, this current approach to code enforcement is ineffective, inefficient, and inequitable. At the same time, the UBL is narrowly and exclusively being used to carry out demolitions by the Redevelopment Commission.

Community Progress facilitated multiple workshops on the benefits of more robust use of the UBL with key City officials, including the Mayor, and built strong consensus to use the UBL more frequently and, consequently, reduce the number of code violations that are processed through the courts.[28]

The UBL, with its focus on eliminating unsafe conditions from unoccupied premises, is ideally suited to confronting the wide array of short-term and long-term vacant property problems as well as the variety of owner situations. A work order issued under the UBL also affords the City (or a contractor hired by the City) the opportunity to access the private property, remedy the unsafe or unsanitary condition, bill the owner to recover the costs, and if unpaid, seek either a judgment lien against all properties owned by the individual or entity in question or a special assessment lien against the specific property. Under state law, special assessment liens are treated equally as property taxes, and therefore can be enforced through the tax sale process. In other words, the use of UBL opens up new pathways and more advanced strategies that the City can pursue as its gains confidence in and comfort with this administrative approach.

It will be a challenge initially for the City to move away from the broken status quo and toward a new code enforcement approach. Though Community Progress helped City officials reach consensus on some basic criteria to determine whether a violation should be addressed through the citation process or the administrative process (UBL), officials will need to consistently evaluate which enforcement pathways and actions are most appropriate for particular properties and situations. The City will also want to identify (and better understand) the inventory of properties that are at least four years tax-delinquent or have recycled through the tax certificate/deed sales at least two years in a row, and consider a "No Criminal Citation" policy unless there are imminent concerns over public health and safety (any enforcement actions on strategically targeted, abandoned, tax-delinquent properties should almost always be pursued administratively through the UBL pathway). Such implementation challenges and questions should be faced head-on instead of used as reasons for not moving forward with reforms. Ultimately, as other high-performing communities have shown, relying more heavily on administrative hearings while still selectively pushing a limited number of cases forward for criminal prosecution establishes a solid foundation from which more advanced enforcement strategies and programs can be built.

INSTITUTIONALIZE AND SUSTAIN INTERAGENCY COLLABORATION

Sustaining interagency collaboration will be critical for the successful implementation of these recommendations and the adoption of a more data-driven approach to tackling vacancy and

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[28] Jim Kelly, our team's legal and policy expert, not only facilitated multiple on-site workshops with the City's lawyers and Building Commissioner, but also prepared a number of technical documents to help the City make this transition successfully, including an implementation memo; a flowchart showing how notices must be served; a draft Notice of Order, pursuant to UBL; and a revised Notice of Hearing, pursuant to UBL.

abandonment. The City should consider transitioning and expanding the TASP Implementation Project Team (TIP Team) into the City's Blight Task Force (or Vacant and Abandoned Property Task Force). The Task Force, which should meet monthly and report quarterly to the Mayor, City Council, and the public, could be supported by smaller work groups that meet weekly and focus on three key areas: Enforcement Work Group, Data Work Group, and Neighborhood Planning and Development Work Group. A proposed member structure, drafted by members of the TIP Team, is included in Appendix C.

HARDSHIP PROGRAMS FOR LEGACY RESIDENTS

The current approach of issuing criminal citations for all property maintenance violations has revealed that a number of legacy residents and property owners want to do the right thing, but often lack the resources needed to comply in a timely manner. It makes little sense to fine responsible owners with limited financial means, which only steers money back to the courts and City coffers when the goal should be to encourage reinvestment in their properties. To this end, the City should consider connecting its existing housing or demolition programs to the needs of struggling legacy residents, and where possible, solicit public, philanthropic, and private sector grants to bolster capacity and flexibility of these programs. Two possible examples are as follows:

Garage Tear-Down Program Expansion

Redevelopment Commission's Garage Tear-Down Program could expand eligibility to private property owners who are noticed (UBL) or cited for unsafe accessory building or shed, which was the second most common citation issued in 2014. The City can explore creative ways to incentivize timely compliance, such as a cost-share program that provides the largest subsidy for voluntary and timely compliance. The subsidy would decrease the longer the owner delays action.

CDBG Housing Programs

The Community Development Division runs a housing repair program, and funds a local CHDO/nonprofit to run a repair programs for seniors. These programs might be redesigned to prioritize and assist income-eligible homeowners in addressing more costly repairs that are ordered pursuant to the UBL.

FINANCING

As mentioned previously, the City directly funds five of the six code inspectors through the annual CDBG program, which relegates the sixth inspector to the most stable district in Gary. The five inspectors that are 100% funded with CDBG must show that their enforcement actions are always targeted to CDBG-eligible census tracts (more than 50% of the census tract population is at or below 80% of the average median income, and nearly the entire City is eligible). Though it is extremely common for CDBG entitlement communities to use a portion

of this annual federal grant to fund code inspectors, some communities are choosing to fund the activity a bit differently in order to allow for maximum flexibility in deploying personnel.

To this end, the City is encouraged to explore shifting all code enforcement program costs, including the six inspectors, to the General Fund, and then having the CDBG program make a direct payment to the City for the provision of eligible inspection and enforcement services. For instance, if absorbing the Code Enforcement Office into the general fund will add approximately $200,000 in new expenses, the CDBG program might make an annual payment of $150,000 to the City, with the expectation that 75% of all activity carried out by the Code Enforcement Office is directed to CDBG-eligible areas and part of a comprehensive neighborhood revitalization plan. If all or most code inspection activity is captured in Cartegraph, it would be relatively simple to generate a report, tied to location, that verifies 75% or more of all enforcement actions were in CDBG-eligible areas. Additionally, any court fines received from code enforcement activity would be considered general fund revenue and no longer directed back to the CDBG Division as program income, which is expressly stated as an allowable practice in a recent HUD Guidance memo on using CDBG funds for code enforcement.[29] Ultimately, this different funding approach would allow the Building Commissioner a great deal of flexibility in deploying inspectors as part of a comprehensive, data-driven and market-informed strategy to revitalizing neighborhoods.

Community Progress strongly encourages the City to review HUD's Guidance Memo on using CDBG funds for code enforcement activities and discuss this alternative funding approach with their regional HUD representative before making any final decisions and adjustments.

The City is also encouraged to allocate sufficient resources in the 2016 budget to cover the technical support needed from Cartegraph to customize the software for code enforcement, and ensure the GIS Manager from the Sanitary District is directly involved in this information management upgrade. This is an important investment to make, and should be done quickly and completely in the coming year, perhaps by the end of the first quarter. The City should keep in mind findings from this report—that it is annually spending $85,000 on ineffective code enforcement activity—and redirecting a portion of that amount in 2016 to support Cartegraph improvements and customization as part of an overall reform initiative that will yield far more effective enforcement actions and reduce waste. Another option may be to seek a grant from a local philanthropic partner to support timely implementation of this specific IT recommendation.

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[29] U.S. Housing and Urban Development, Community Planning and Development, "Notice: CPD-14-016, Use of CDBG Funds for Code Enforcement Activities," October 2014, https://www.hudexchange.info/resources/documents/Notice-CPD-14-016-Use-of-CDBG-Funds-for-Code-Enforcement-Activities.pdf.

Table 4

Summary of key policy recommendations to assist the City develop a more strategic code enforcement program and improved data management systems and practices.

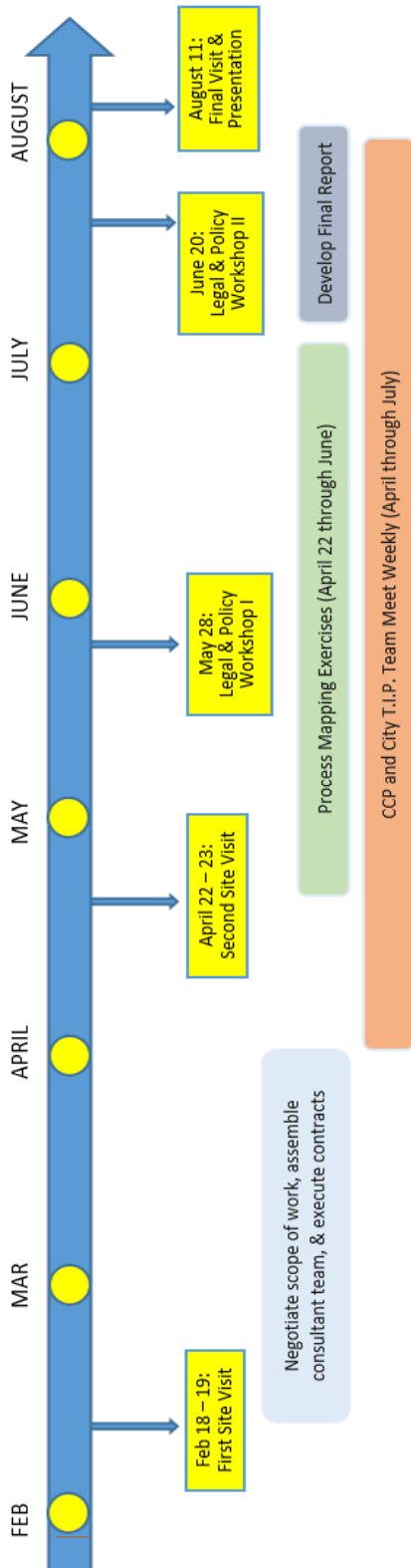| RECOMMENDATIONS	
Reorganization	**Benefits**
Relocate code enforcement officers to the Building Department, under the supervision of the City's Building Commissioner, and make additional HR adjustments as needed.	Will ensure more effective implementation of Unsafe Building Law Moves all code enforcement data into Cartegraph, a sophisticated software solution that will allow for better tracking, data sharing and analysis Allows Building Department to cross-train inspectors, build capacity, and deploy resources flexibly and more strategically
Funding Decisions	**Benefits**
Consider shifting all inspection officers to the general fund with CDBG program paying the City for enforcement services in eligible areas consistent with program regulations.	Will reduce administrative work between CDBG and City Will allow Building Commissioner to deploy his inspectors more strategically
All court fines generated by CDBG-funded code enforcement officers will go the City's General Fund, consistent with HUD Guidance (10/14).	New general fund expenses will be offset with new revenue from CDBG annual payment and court fines
Institutionalize InterAgency Collaboration	**Benefits**
Transition and expand the TASP Implementation Project Team (TIP Team) to the City's Blight Task Force (or Vacant and Abandoned Property Task Force), which should meet monthly.	Maintains continuity of project Will ensure sustained, effective collaboration on Mayor's top priority Broadens the TIP Team and connects with other ongoing 'project teams' related to vacancy and abandonment
Establish three teams of the Task Force: (1) Enforcement Team, (2) Neighborhood Development and Planning Team, and (3) Data Team.	Delegates responsibility for implementing Task Force recommendations to work groups that meet weekly Allows for very focused, action-oriented discussions on key issues outside of broader task force
Enforcement Strategies	**Benefits**
Consider addressing most code violations through the administrative process (Unsafe Building Law) instead of criminal process.	Opens up more effective pathways for enforcement based on strategic priority, type of problem property and violation, location, etc. Ratchets down the criminalization of property maintenance code violations More effective and efficient use of inspectors and lawyers Makes it easier for City to remedy violation in the event of non-compliance Sets the stage for more advanced code enforcement strategies in the future, including placement of liens and lien enforcement for chronic offenders
Consider creating a "No Cite" list, unless there are obvious public safety concerns, of properties that have recycled through the certificate/deed sale at least two years (or, that are four years tax-delinquent).	Acknowledges that expending code inspection and enforcement resources on abandoned properties yields no positive outcomes. Allows for commitment of limited resources to violations that can more readily corrected.
Acknowledge and affirm the value of the existing "Enforcement Task Force" in prosecuting the worst of the worst, and consider this task force as part of a larger, coordinated strategy to deploy a range of tools across a range of problems.	Ensures focus of City resources on chronic offenders to yield maximum impact Builds culture of teamwork and data sharing, and promotes understanding of abilities, needs, and limitations of respective departments/offices
Programmatic Changes	**Benefits**
Consider connecting City's existing programs to the needs of struggling legacy residents, and where possible, soliciting public, philanthropic and private sector grants to bolster capacity and flexibility of these programs.	Connects financially constrained legacy residents with resources instead of punishing them with criminal fines and court fees, advancing social justice. Fosters partnership with responsible owners in protecting their asset, trying to drive up market conditions and confidence, and restoring the tax base

SECTION 5. CONCLUSION

The City of Gary faces what might seem like insurmountable levels of vacancy and abandonment, and trends of disinvestment and population loss that rival some of the worst in the nation. However, no matter how daunting the task, our experience has shown that an accurate diagnosis of the problem, well-designed solutions, and strong political leadership can set the stage for meaningful progress toward the ultimate goal of creating healthier neighborhoods for all.

There is no question Gary has the benefit of strong political leadership. Mayor Freeman-Wilson and her team—supported by City Council, the Legacy Foundation, University of Chicago, the Strong Cities, Strong Communities Team, and many other community stakeholders—have made some impressive gains the last four years. Our hope is that this six-month engagement, through our Technical Assistance Scholarship Program, has helped uncover some of the underlying problems contributing to high levels of vacancy and abandonment, and can point to some effective solutions for the City to pursue as it looks to build a data-driven, market-informed approach to neighborhood stabilization and revitalization.

APPENDIX A. PROJECT TIMELINE

Timeline months: FEB, MAR, APRIL, MAY, JUNE, JULY, AUGUST

Timeline milestones:
- Feb 18 – 19: First Site Visit
- April 22 – 23: Second Site Visit
- May 28: Legal & Policy Workshop I
- June 20: Legal & Policy Workshop II
- August 11: Final Visit & Presentation

Other bars:
- Negotiate scope of work, assemble consultant team, & execute contracts
- Process Mapping Exercises (April 22 through June)
- CCP and City T.I.P. Team Meet Weekly (April through July)
- Develop Final Report

PROJECT DELIVERABLES:

➢ Conducted an initial two-day site visit in February, which served two roles: a) information sharing through a half-day community roundtable and b) information gathering from key stakeholders to better understand the systemic causes of problem properties and the systems that impact these properties through a full-day of interviews.

➢ Conducted a second site visit in April to initiate a deliberate, critical analysis of existing code enforcement activities, led by CCP team member Lincoln Chandler with support from Project Manager Tarik Abdelazim. The visit marked the beginning of an extensive process mapping exercise to uncover data, policy and operational needs, and point to how the City might implement a more strategic code enforcement program.

➢ Co-facilitated and participated in the weekly meetings of the T.I.P. Team.

➢ Conducted two one-day site visits to specifically address pressing legal and policy issues, led by CCP team member Jim Kelly, with a focus on the Unsafe Building Law and tax foreclosure issues.

➢ Submitted a final report documenting and summarizing the delivery of this technical assistance, with the general public as the intended audience.

➢ Conducted final site visit to present overall findings and recommendations at three separate meetings for different audiences (Mayor's Cabinet, Community Stakeholders, and General Public)

➢ Provided Gary with four registrations to the 2015 RVP Conference, which was held May 19 – 21 in Detroit, MI.

APPENDIX B. BIOS OF TASP-GARY PROJECT TEAM

Tarik Abdelazim, who served as project manager, team lead and primary author of this report, joined the Center for Community Progress in July 2014 to serve as the Associate Director of National Technical Assistance. Prior to joining the Center for Community Progress, Tarik had recently completed eight years of public service in Binghamton, New York under two different executive titles in City Hall. For four years, he served as Deputy Mayor, leading high-priority interdepartmental teams, driving innovative IT/IM reform, and directing award-winning blight prevention initiatives. Tarik then served for nearly four years as Director of Planning, Housing and Community Development, and spearheaded a variety of cross-sector collaborations around a set of livability and sustainability goals, again winning national distinction for inclusive, bold community development programs. In his capacity as Director of PHCD, Tarik managed and oversaw the implementation of an expansive and diverse portfolio of federal and state grants awards from housing and community development programs. Tarik was also instrumental in building interest in and support for the creation of the Broome County Land Bank, one of the first eight land banks established in NY under the state's 2011 Land Bank Authorization Act.

Tarik received his Masters in Arts and Humanities from New York University, with an interdisciplinary focus on politics, ecology, and philosophy. He has a Bachelor of Arts from Hamilton College in biology.

James J. Kelly, Jr., who provided legal and policy expertise, is Clinical Professor of Law at Notre Dame Law School, where he teaches Real Estate Transactions and directs and teaches the Community Development Clinic. He currently serves as Editor-in-Chief of the Journal of Affordable Housing and Community Development Law. Prior to joining the Notre Dame Law faculty in 2011, he served as Assistant Professor of Law and Director of the Community Development Clinic at the University of Baltimore School of Law.

Before beginning his teaching career in 2004, Prof. Kelly, as Executive Director of Save A Neighborhood, Inc. and Legal Consultant for Baltimore's Project 5000, worked to assist the City and community groups in acquiring clear title to vacant houses and vacant lot and, as a Staff Attorney for the Community Law Center, to represent Baltimore nonprofits in their community revitalization efforts. Prior to moving to Baltimore in 1999, he also represented and counseled tenants and tenant groups for the Northern Manhattan Improvement Corp., where his work was funded by the Skadden Fellowship Foundation.

Lincoln J. Chandler, PhD, who provided IM expertise and operations analytic support, advises organizational leaders on operations strategy, program evaluation, and communication, with a special emphasis on public - private partnerships and cross-functional teams. Over the past fifteen years, Lincoln has served Fortune 500 companies, municipal governments, quasi-governmental agencies, and various nonprofits.

As a consultant, Lincoln has helmed a number of projects, including: defining a unified blight abatement data strategy for the City of Gary (IN), enabling the City to capture $6.6M in state funding to demolish abandoned properties; development of the first cross-agency jail dashboard for Cook County (IL); and redesign of student registration and other operational processes for the City Colleges of Chicago, yielding $10M in savings.

Lincoln earned his Masters and PhD degrees in Operations Research from the Massachusetts Institute of Technology, and is also a summa cum laude graduate of Florida A&M University. Currently, he serves on the Chicago Alumni Board of Education Pioneers, a national network of professionals engaged in K12 education reform.

APPENDIX C. PROPOSED CITY OF GARY BLIGHT TASK FORCE

As the City transitions out of the Technical Assistance Scholarship from the Center for Community Progress, the Blight Task Force will continue the work done over the course of the engagement. This work will build upon what's already being done and work to implement the recommendations made by the Center for Community Progress as a result of their six-month engagement with the City.

Data Team

Focused on data collection, normalization, and building out G-STADS™, Gary Maps and GaryCounts.

Martin Brown (Team Lead) – Gary Sanitary District
Steve Broadwell – Gary Redevelopment Commission/GSD
Nigel Griswold – Dynamo Metrics
Ben Calnin – Dynamo Metrics
Matt Tylicki – City of Gary IT Department
Sarita Titus – City of Gary Police Department
Lacie Denwood – City of Gary IT Department
Eddie Tejeda – Civic Insight
Matt Hampel – LocalData
VISTA New Hire (TBD)

Enforcement Team

Focused on code enforcement, unsafe building law, policy, citations, day-to-day blight remediation and ordinances

Rodney Pol (Team Lead) – City of Gary Law Department
Steven Marcus – City of Gary Buildings Department
Niquelle Allen – City of Gary Law Department
Brian Evans – City of Gary Police Department
Kenya Maclin – City of Gary Code Enforcement Department
Peter Julovich – City of Gary Environmental Affairs
Gilbert King, Jr. – Gary Redevelopment Commission
LaShawn Brooks – Mayor's Office of Constituent Services

NOTE: We want to be mindful of the existing Enforcement Team, and consider merging the two or identifying a sensible way to ensure there is coordination and communication.

Neighborhood Development and Planning Team

Focused on longer-term policies for blight remediation, targeted demolition and board-up, tax delinquency, green infrastructure and land use

> Joe van Dyk (Team Lead) – Gary Redevelopment Commission
> Arlene Colvin – City of Gary Community Development
> La'Kisha Girder – City of Gary Planning Department
> Cedric Kuykendall – Gary Redevelopment Commission
> Denise Etchison – Gary Redevelopment Commission
> Stephanie Cwik – USEPA, SC2 Team
> Brenda Scott-Henry – City of Gary Green Urbanism Department
> Representative from Building Department
> Commissioner Mike Repay – Lake County Commissioners
> VISTA New Hire (TBD)