

Module 01

Establishing the Purpose of Code Enforcement

01



Establishing the Purpose of Code Enforcement

This module helps code enforcement teams understand the core purpose of their job.

Leadership should use the recommendations in this section to establish shared goals and expectations for how inspectors will work to achieve those goals. For example, while compliance is the ultimate goal, the approach to achieve it will vary based on key factors like property ownership, market conditions, and occupancy status. Inspectors must be able to apply different strategies and enforcement tools accordingly.



MODULE OVERVIEW

GOAL	Inspectors understand how property types, ownership, markets, neighborhood conditions, and other factors influence enforcement decisions
AUDIENCE	Code enforcement inspectors
TRAINING STAFF	Senior code enforcement inspectors and staff with three or more years of experience
TIMING	At onboarding (60-75 minutes) and biannual refresher course (30-45 minutes, focused on examples)
TOPICS	Mission, goals, and values of code enforcement team; factors that influence decisions related to enforcement approaches and tools
MATERIALS	Presentation, pictures from actual cases for examples

Key Training Components

1 Align on the Department's Mission, Vision, and Goals

Establish consensus around mission, vision and goals, and infuse those into training. For example, the mission, vision, and goals language could include:

- The mission of the Division of Code Enforcement is to ensure safe, healthy neighborhoods for all.
- To accomplish our mission, we utilize an equitable, efficient, and effective approach to encourage and compel private property owners to comply with state and local property standards.
- To ensure our approach to code enforcement is equitable, efficient, and effective we are committed to the following activities:
 - Proactively educating property owners on how to comply with state and local property standards
 - Directing financially constrained property owners to resources for critical health and safety repairs
 - Abating immediate dangers to protect homeowners, tenants, and neighbors
 - Holding owners of vacant property or those who refuse to comply accountable, using tools to quickly ensure compliance or transfer of the property to a new, responsible owner.

2 Explain Code Enforcement's Role in the Broader Context

Help inspectors see their role within broader systems that address vacancy, abandonment, and deterioration. For example:

- Highlight the work of other City departments (e.g., Police, Fire, Community Development,



Field Spotlight: Baltimore, Maryland

The City of Baltimore requires code enforcement officers to deeply understand and even memorize the department's mission. This emphasis is a cornerstone of onboarding and reinforces a commitment to customer service throughout an inspector's tenure. The mission statement of the Baltimore City Code Enforcement department reads:

To enforce the building, fire, and related codes of Baltimore City to ensure the integrity of the permit process, safe buildings, habitable housing and decent neighborhoods, while providing prompt and courteous service to those citizens and clients that desire the same.

Aging) and private partners (e.g., CDCs, Connected Communities) that help owners repair or maintain property.

- Demonstrate how public data systems, code enforcement, delinquent property tax systems, and land banks can be coordinated to steer vacant properties towards reuse in support of community goals.

3 Train Inspectors on Dynamics that Impact Compliance

Equip inspectors to assess varied economic circumstances, ownership challenges, and other factors that impact an owner's willingness or ability to comply. Some of those factors include:

- *Economics*: If the cost of repairs to bring a property into compliance exceed the value of the property, owners may be inclined to forgo the needed maintenance.
- *Ownership challenges*: Tangled titles or LLC ownership complicate accountability. For example, **heirs' properties** that do not have clear title may be ineligible for grants or private

financing, and strict enforcement could put a family on the path to losing generational wealth. Conversely, code enforcement tools are often ineffective against negligent property owners who hide behind LLCs.

- *Lack of ability or resources:* Elderly, disabled, or low-income owners may not have the physical or financial capacity to make the repairs.
- *Historic lack of, or inconsistent, enforcement:* Inconsistent actions by a local government on code violations reduces owner compliance.



A Deeper Dive: Fines

When fines are the only enforcement tool and those fines are either extremely low (e.g., far less than the cost of repairs) or not enforced consistently (e.g., low priority lien only enforced upon sale of property), savvy owners will either pay off the fines and not make the repairs or simply ignore them.

Overly aggressive enforcement of high fines coupled with the inability or unwillingness to direct more vulnerable owners (or owners acting in good faith) to resources to help make repairs can encourage owners to avoid compliance or abandon the property.

Economics of Compliance

If the cost of repairs is more than a property is worth, some owners may not think repairs are worth it. Let's run the numbers on this hypothetical property:

Fair market value	\$50,000
Outstanding mortgage/liens	-\$25,000
New roof and window and structural repairs	-\$31,000
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Potential Negative Equity	-\$6,000



An owner may be unlikely to repair given their inability to recover the investment.

4 Teach Using Real-World Examples

Use real or hypothetical properties to show how various factors influence decision-making and demonstrate strategies that reach compliance while considering an owner's particular circumstances. Here is an example workshop structure:

A Select Sample Properties

Select three to five real or hypothetical properties with code enforcement actions. Property types can include:

- Single family, owner-occupied property
- Three-unit residential, tenant-occupied
- Vacant lot, absentee owner
- Vacant single family, owned by heirs of deceased family member
- Strip mall with one or two vacancies and deferred maintenance, reports of criminal activity
- Large apartment building that is occupied and has façade issues



B Craft Detailed Case Examples

Example 1

Ms. Smith is a widower who owns a single-family home and lives on a fixed income. A neighbor reported her home for falling gutters, a couple of broken windows, and her overgrown sidewalk filled with rubbish, which has become completely impassable. What are the most equitable, efficient, and effective approaches to reach compliance to ensure Ms. Smith lives in a safe home and to maintain neighborhood health and safety?

How might strategies to address the property change if...

- the property is in a stable neighborhood and it is the sole eyesore on the block.
- the property is in a weak market neighborhood where many homes have deferred property maintenance and code violations.
- the property is owned by an out-of-state LLC.



Example 2

A tenant called to complain about a nonfunctioning furnace and water damage in their apartment in a three-unit property. The out-of-state property owner has a history of being unresponsive to violation notices. Operating under an LLC, the landlord will at times pay fines at the conclusion of enforcement action but often fails to make the needed repairs, or does only the bare minimum. What are the most equitable, efficient, and effective approaches to reach compliance to improve neighborhood health and safety?

How might strategies to address the property change if...

- the owner is local, owns only a few properties, and provides rents to households surviving on or around \$30,000/year or less.
- the owner is willing to make repairs but does not have access to cash or the needed financing.
- one of the tenants, who has limited income, expresses a fear that if they report violations, their landlord will retaliate against them.



C Facilitate Discussion

Facilitate a discussion to determine the most equitable, efficient, and effective approaches in each case to reach compliance. Consider tools, resources, and actions such as:

- Providing owners with clear directions as to which violations need to be addressed and how they might do so
- Providing a list of local contractors or companies that do the type of work
- Providing the owner more time to comply
- Issuing civil tickets
- Initiating other court action
- Abating conditions and billing the owner
- Directing the owner to public or private resources for repair
- Referring the matter to another City department or public agency
- Identifying if unpaid fines/liens (or unpaid taxes) could be used to compel a transfer of the property (e.g., lien foreclosure, tax foreclosure) and whether a local land bank might be a good partner)

Additional Resources

- [A Message from Code Enforcement Officers](#), City of Baltimore
- [Webinar: Reevaluating Code Enforcement](#), Community Progress
- [Webinar: Strategic Code Compliance 101](#), Community Progress
- [Webinar: The State of Strategic Code Enforcement](#), SCEMA and Community Progress
- [Webinar: Using Data to Understand Markets](#), Community Progress
- [Example job posting](#), City of Peoria
- [Example job posting](#), City of Cincinnati

Implementation Steps

Short Term

1. Refine mission statement, values, and goals.
2. Work with inspectors to select example properties for discussion.
3. Identify key third party resources and webinars to share.
4. Consider creating a map with demographics by neighborhoods, council districts, or other relevant boundaries that includes homeownership rate, household income, and/or poverty rate, and posting in various locations in the office as a quick reference point for inspectors.

Long Term

1. Refine hiring materials to incorporate updated mission statement, values, and goals.
2. Identify opportunities for inspectors to modify and teach this module to provide ownership of training development and leadership opportunities.

