Agenda

- Housekeeping
- Check-in on Course Progress
- Enforcing PRI Programs - Overview, Lessons from Syracuse, Q&A
- Funding PRI Programs - Overview, Lessons from Syracuse, Q&A
- Evaluating PRI Programs - Overview, Lessons from Syracuse, Q&A
- Wrap-up and Next Steps
Housekeeping

- Please remain on Mute unless asked to share.
- If bandwidth allows, please consider sharing your video while asking questions.
- Update your name to read “First Name_City, State”
  - Click Participants
  - Select your name, then select “Rename”
- Share any questions you may have in the public chat box.
- All sessions will be recorded; shared with registered participants.
Sprint Check-in

- Week 1: Sprint Kick-Off and Overview
- Week 2: Creating a Healthy Housing Snapshot
- Week 3: City Breakout Discussions (Part One)
- Week 4: City Breakout Discussions (Part Two)
- Week 5: Policy Learning: Housing & Inspections
- **Week 6:** Policy Learning: Operations
- Week 7: Racial Equity & Community Engagement
- Week 8: Lessons Learned from Other Local PRI Efforts
- Week 9: One-on-One Action Plan Development Sessions
- Week 10: Changing the Culture of Code Enforcement
- Week 11: Beyond PRI
- Week 12: Moving Forward & Next Steps
Proactive Rental Inspection

- PRI programs typically include a basic program structure:
  - Registration of rental properties
  - Regular, periodic inspections of rental properties
  - Enforcement designed to incentivize compliance while promoting equitable outcomes
- Lots of options for how to structure
QUESTIONS TO CONSIDER WHEN DEVELOPING A PRI PROGRAM

- How will we identify rental units?
- Which units should be inspected?
- How often will inspections take place?
- Who will perform the inspection?
- What will be the scope of inspections?
- How will we give notice?
- What will enforcement look like?
- How will the program be funded?
- How will we know it is working?
Enforcing PRI Programs
What is equitable enforcement?

the process of ensuring compliance with law and policy that considers and minimizes harms to underserved communities
Equitable Enforcement & PRI

PRI can help to address systematic underenforcement of local housing codes in underserved communities . . .

. . . BUT, PRI programs should also be implemented carefully and conscientiously to ensure that enforcement actions don’t result in avoidable adverse consequences for tenants and landlords.
PRI Enforcement: Potential Unintended Consequences

Burdens on Landlords (especially low-income)
- Inability to pay fines or afford the cost of repairs
- Foreclosure, if there is a loss of rental income
  - In a weak market, LL may walk away if repairs + liens > FMV

Burdens on Tenants
- Rent increases, if LL raises rent to cover the cost of repairs
- Displacement, if . . .
  - Severe habitability issues
  - Illegal units
  - Tenant-side code violations (e.g., hoarding, overcrowding)
- Landlord retaliation or harassment
PRI Enforcement: What are your goals?

In general, the **goals of enforcing PRI requirements** include:

- Incentivize compliance with the local housing code
- Promote community health and safety
- Maintain the supply of quality, affordable housing
- Increase housing stability
Traditional PRI Approach: What is the enforcement process?

Three steps:

1. If a violation is identified upon inspection, issuance of a **notice** or **order to comply**
2. If compliance is not achieved within the requisite timeframe, imposition of a **fine** or **other penalty**
3. Potentially, a **right to appeal** or **contest the penalty**
PRI Enforcement: Design Considerations

Factors to consider when weighing enforcement options:

1. What is the best approach given the severity of the violation
2. What is the best approach given the landlord’s past record of compliance
Step 1: Notice of Violation

A notice typically must . . .

● Describe the activities or conditions in violation of the municipal code

● List actions necessary to correct the violation(s)

● Set out the deadline or specific date to correct the violation(s)

● Explain the consequences of continued noncompliance
Step 1: Notice of Violation

Design Options to Promote Equity and Compliance

● Issue the notice in multiple languages so that the information is accessible to speakers with limited English proficiency

● Vary the timeline for compliance based on the severity of the violation

● Provide opportunities for extension based on owner’s demonstrated progress towards making repairs
Step 2: Consequences for Noncompliance

Types of Penalties

- Administrative penalties
  - Administrative fine
  - Suspend or revoke rental license

- Civil penalties
  - Civil monetary penalty
  - Injunction

- Criminal penalties
  - Criminal fines (infraction or misdemeanor)

- Property liens to recover fees or costs
Step 2: Consequences for Noncompliance

Design Options to Promote Equity and Compliance

- Adopt a cooperative compliance model -- landlord outreach, education, and connections with resources to help with repairs

- Implement a Rent Escrow Account Program or Rental Rehabilitation Assistance Program

- Build inter-agency or cross-sector partnerships to provide services
Step 3: Right to Appeal

- Appeal process can vary depending on whether the enforcement action is administrative, civil, or criminal in nature.
- Administrative appeals are typically overseen by a specialized administrative appeals agency within city government or by a hearing officer, who is a city employee.
- Civil and criminal appeals happen within the court system.
Syracuse Proactive Enforcement Strategies

● Stick
  ○ BAA

● Carrot
  ○ Voluntary Compliance
  ○ Landlord Outreach
  ○ Inspection Invitation
  ○ Code Inspector Binders
  ○ Connection to Resources
  ○ Landlord Education Opportunities
  ○ Public Meetings
Syracuse Proactive Enforcement Strategies

Bureau of Administrative Adjudication
Syracuse Proactive Enforcement Strategies

Voluntary Compliance
Syracuse Proactive Enforcement Strategies

Landlord Outreach
Syracuse Proactive Enforcement Strategies

Inspection Invitation for Property Owner
Syracuse Proactive Enforcement Strategies

Code Inspector

Binders
Syracuse Proactive Enforcement Strategies

Connection to Resources

URGENT CARE PROGRAM

The Urgent Care program provides income-eligible homeowners with loans of up to $20,000. Some loans may be partial payback depending on your household income. This program is made possible through the City of Syracuse. This program is for EMERGENCY REPAIR ONLY: Leaking Roof, Sewage/Plumbing Leak, Non-Working Furnace, Foundation Collapse, Ramps and Priority Code Violations.

PROGRAM DETAILS

- Income-eligible homeowners may receive part of the loan as a grant. If you qualify, you will only have to pay back a portion of the repair costs.
- The portion of the loan that you have to pay back has a 4.99% fixed interest rate.

ELIGIBILITY REQUIREMENTS

- You must own your house in the City of Syracuse.
- Your repairs must be an emergency, including: leaking roofs, sewage backup, broken furnaces, code violations, and other life/safety issues.
- Your household must earn less than 80% of HUD median income guidelines (based on family size).
- Your property taxes, water bill, and mortgage must be current.
- The home must be your primary residence.

PROGRAM APPLICATION
Syracuse Proactive Enforcement Strategies

Landlord Education Opportunities
Syracuse Proactive Enforcement Strategies

Landlord Education Opportunities
Syracuse Proactive Enforcement Strategies

Public Meetings
New Resource!

Equitable Enforcement to Achieve Health Equity: An Introductory Guide for Policymakers and Practitioners
Questions?
Funding PRI Programs
Funding: What We’ll Discuss

- Traditional PRI funding mechanisms
- Alternative funding sources -- general fund revenues, grants, and institutional partnerships
- Options to tailor your PRI program to conserve city resources while promoting program goals
Overarching Considerations

● Most PRI Programs are funded by fees and fines
● In this way, funding and enforcement are linked
● To promote equitable outcomes . . .
  ○ Revenue generation should not be the primary purpose of enforcement
  ○ Funding should not drive policy design decisions
Traditional Funding Tools

- **Fees vs. Fines**
  - Fees are payments for specific city functions. They are primarily intended to cover operational costs.
  - Fines are monetary punishments for code violations. They are primarily intended to incentivize compliance.
Traditional Funding Tools

- **Types of program administration fees**
  - Registration and licensing fees
  - Inspection, reinspection, and self-certification fees
  - Fees for late payments or missed appointments

- **Types of fines**
  - Administrative, civil, criminal
<table>
<thead>
<tr>
<th>City</th>
<th>Pop.</th>
<th>Renter Homes</th>
<th>License or Registration Fee</th>
<th>Inspection Fee</th>
<th>Reinspection Fee</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Brunswick, NJ</td>
<td>54,500</td>
<td>80.58%</td>
<td>$25 per unit annually</td>
<td>$20 per unit every 3 years</td>
<td>$15 per unit</td>
<td>N/A</td>
</tr>
<tr>
<td>Santa Cruz, CA</td>
<td>64,752</td>
<td>56.04%</td>
<td>$50 per unit annually</td>
<td>$22 per unit annually (covers first inspection and 1 reinspection)</td>
<td>$123 per hour</td>
<td>Owners with a record of compliance are eligible for reduced inspection fees</td>
</tr>
<tr>
<td>Boulder, CO</td>
<td>107,353</td>
<td>52.21%</td>
<td>$105 per building every 4 years</td>
<td>N/A – Initial inspections are performed by licensed, third-party inspectors</td>
<td>$250 per “investigative” inspection</td>
<td>N/A</td>
</tr>
<tr>
<td>Rochester, NY</td>
<td>206,284</td>
<td>63.12%</td>
<td>For structures with 3 units or more, base fee of $100 every 3 years*</td>
<td>N/A</td>
<td>N/A</td>
<td>*An additional $10 fee applies for each additional unit over 5</td>
</tr>
</tbody>
</table>
Alternative Funding Sources

- General fund revenues
- Public and Private Grants
  - Example: [HUD Lead-Based Paint Hazard Control Grant Program](#)
- Hospital Partnerships
  - Example: [Bon Secours Hospital](#)
Policy Design Options:
Tailoring Your Program to Conserve City Resources

- Targeting “bad actors” based on prior compliance
- Targeting high-risk areas for more frequent inspections
- Limiting the # of units covered
- Allowing third-party inspectors
### Policy Design Options:
Tailoring Your Program to Conserve City Resources

**Example: Brooklyn Center, MN** *(source: NLC, Advancing City-Level Healthy Housing)*

<table>
<thead>
<tr>
<th>License Category</th>
<th>Number of Units</th>
<th>Violations Per Unit</th>
<th>Duration of Rental License</th>
</tr>
</thead>
<tbody>
<tr>
<td>Type I</td>
<td>1-2 3+</td>
<td>0 - 1 0 - 0.75</td>
<td>3 years</td>
</tr>
<tr>
<td>Type II</td>
<td>1-2 3+</td>
<td>1 &lt; x ≤ 4 0.75 &lt; x ≤ 1.5</td>
<td>2 years</td>
</tr>
<tr>
<td>Type III</td>
<td>1-2 3+</td>
<td>4 &lt; x ≤ 8 1.5 &lt; x ≤ 3</td>
<td>1 year</td>
</tr>
<tr>
<td>Type IV</td>
<td>1-2 3+</td>
<td>&gt; 8 &gt; 3</td>
<td>6 months</td>
</tr>
</tbody>
</table>
Policy Design Options: Tailoring Your Program to Conserve City Resources

- Targeting “bad actors” based on prior compliance
- Targeting high-risk areas for more frequent inspections
- Limiting the # of units covered
- Allowing third-party inspectors
Policy Design Options: Tailoring Your Program to Conserve City Resources

- Targeting “bad actors” based on prior compliance
- Targeting high-risk areas for more frequent inspections
- Limiting the # of units covered
- Allowing third-party inspectors
Syracuse Funding Strategies

- Permit fees
- Periodic inspection fees
- HUD Funding
- Grants
- Partnerships
There are things you can do without any money. Don’t be discouraged if you don’t have a budget for new things.
Questions?
Evaluating Your PRI Program
Purposes of Evaluation

- Improving program outcomes
- Identifying challenges and course correcting
- Increasing program transparency by reporting to government officials and community members
Include Evaluation and Reporting Requirements in PRI Ordinance

- **Example:** The City of Seattle’s PRI ordinance requires an annual report to city council, including an evaluation of properties’ registration status, rates of compliance, and program fees and costs.

- **Example:** The City of Santa Cruz’s PRI ordinance requires reporting to city council about the number of rental units saved and lost as a result of the PRI program.
Article VI. Program Review.

___-18. Program Review. Beginning on [_______] and annually, thereafter, the Director shall report to the [City Council / County Board of Supervisors] on the activities of the Proactive Rental Inspection Program, including, but not limited to: (1) the number of rental units registered (including details about any previously unidentified housing units that have been discovered); (2) the number of rental units inspected; (3) Owners’ compliance in allowing inspections to be completed within the timeframe; . . . .
Additional Considerations

Policy Design Options to Promote Health and Equity

● Tracking health outcomes
  ○ EXAMPLE: An Evaluation of the City of Rochester’s Lead Law

● Tracking rates of displacement or eviction

● Requiring disaggregated data by race, income, or other demographic factors
Syracuse Evaluation Strategies

- Philosophy of Evaluation
- Mechanics of Evaluation
- Pushing down Evaluation
Philosophy of Evaluation

Codesign
Philosophy of Evaluation

Permission to Fail + Iteration
Philosophy of Evaluation

Storytelling

Telling Detroit's Story

Aaron Foley
Chief Storyteller
Detroit, Michigan
Mechanics of Evaluation

1. Identify specific program, behavior, initiative you want to measure

2. Brainstorm what can be measured

3. From brainstorm list, identify the mechanics of measuring each item
   a. Which of these items are easier to measure?

4. Baseline your favorite metrics
   a. Are there any surprises?

5. Select the metrics that you like
# Mechanics of Evaluation

## Metrics

<table>
<thead>
<tr>
<th>Property Owner Outreach</th>
<th>Total number of inspector meetings + phone calls per month</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Average number of inspector communications per month</td>
</tr>
<tr>
<td></td>
<td>Percentage of cases that reach compliance after a property owner was contacted</td>
</tr>
</tbody>
</table>
Mechanics of Evaluation

1. Identify potential types of goals for your selected metrics
   a. Mean/Median
   b. % change
   c. # change
   d. % goal

2. Review baselines

3. Set target that pushes you, but with change can be achievable

4. Select the metrics that you like
# Mechanics of Evaluation

## Targets

<table>
<thead>
<tr>
<th>Property Owner Outreach</th>
<th>Increase inspector meetings + phone calls by 20% during pilot period.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The median number of communications per inspector should increase by 50 per inspector. (~2 per day)</td>
</tr>
<tr>
<td></td>
<td>Twenty percent of properties will reach compliance within two weeks of being contacted by the inspector.</td>
</tr>
</tbody>
</table>
# Mechanics of Evaluation

## Check-ins + Feedback

<table>
<thead>
<tr>
<th>Metric</th>
<th>Pilot Inspectors 2016</th>
<th>Pilot Inspectors 2017</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>General Information</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total number of complaints opened</td>
<td>32</td>
<td>92</td>
</tr>
<tr>
<td>Average number of complaints by inspector</td>
<td>16</td>
<td>46</td>
</tr>
<tr>
<td><strong>Territories</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total number of complaints opened by inspector</td>
<td>5</td>
<td>85</td>
</tr>
<tr>
<td>Percentage of complaints opened by inspector</td>
<td>16%</td>
<td>95%</td>
</tr>
<tr>
<td><strong>Block by Block</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Percentage of identified properties with cases opened (as of 11/21/2017)</td>
<td></td>
<td>5</td>
</tr>
<tr>
<td><strong>Building Blocks</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of cases identified on priority block</td>
<td></td>
<td>47%</td>
</tr>
<tr>
<td><strong>Meet Your Inspector</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of cases opened by MYI interactions</td>
<td></td>
<td>4</td>
</tr>
<tr>
<td><strong>Health and Safety Priorities</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average number of Health and Safety Violations per week</td>
<td>3</td>
<td>8</td>
</tr>
<tr>
<td>Percentage of Health and Safety Violations that reach compliance within 30 days</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Customer Service</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of people who complete survey</td>
<td></td>
<td>0</td>
</tr>
<tr>
<td><strong>Property Owner Outreach</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total number of inspector meetings and phone calls per month</td>
<td>34</td>
<td>154</td>
</tr>
<tr>
<td>Average number of Inspector communications per month</td>
<td>17</td>
<td>98</td>
</tr>
<tr>
<td>Percentage of cases that reach compliance after a property owner was contacted</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Compliance</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Percentage of complaints that have been closed</td>
<td>97%</td>
<td>50%</td>
</tr>
<tr>
<td>Percentage of complaints that have been closed within 90 days of being opened</td>
<td>81%</td>
<td></td>
</tr>
<tr>
<td><strong>Displacement</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Number of households displaced for unfit homes</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Key Result:** Ninety-five percent of City services will be delivered by their established resolution time

Due to the seasonality of service types (No Heat in winter vs. Overgrowth in summer), categories will change throughout the year.

Overall services delivered on-time during the last 30 days: **79% On-time**

<table>
<thead>
<tr>
<th>Service Category</th>
<th>On-time Status</th>
<th>Complaints Reported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potholes</td>
<td>100%</td>
<td>126</td>
</tr>
<tr>
<td>Trash and Debris</td>
<td>100%</td>
<td>92</td>
</tr>
<tr>
<td>No Heat</td>
<td>100%</td>
<td>21</td>
</tr>
</tbody>
</table>

---

<table>
<thead>
<tr>
<th>Objective</th>
<th>Key Result</th>
<th>July 1</th>
<th>July 8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Achieve fiscal sustainability.</td>
<td>Spend 10% less each month as the same time period the previous year.</td>
<td>April 1 - May 30: 9.0% decrease June target $14.1M - June to date $11.4 M This may change b/c some accounts may be removed</td>
<td>April 1 - May 30: 9.0% decrease June target $14.1M - June to date $11.9M July target is $6.7M - July to date $72,500</td>
</tr>
<tr>
<td></td>
<td>Sell $3 million of City owned property.</td>
<td>3 of 12 steps completed Next steps: Develop recommendations a. properties b. process SLDC on track for mid-July Offering of Memorandum release Next meeting July 6</td>
<td>3 of 12 steps completed Low working on sales process Top 10 lists being compiled Top 10 lists linked with assessment+geospatial data Recommendation list compiled SDC on track for mid-July Offering of Memorandum release Next meeting 7/27</td>
</tr>
</tbody>
</table>
Pushing Down Evaluation

**Objective**
- Make $ for Owners

**Key Results**
1. Win Super Bowl
2. Fill home stands to 90%+

---

**Head Coach**

**Objective**
- Win Super Bowl

**Key Results**
1. Passing Attack amasses 300+ yards per game
2. Defense allows fewer than 17 points per game
3. Special teams unit ranks in top 3 in punt return coverage

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**General Manager**

**Objective**
- Make $ for Owners

**Key Results**
1. Win Super Bowl
2. Fill home stands to 90%+

---

**SVP of Marketing**

**Objective**
- Fill home stands to 90% capacity

**Key Results**
1. Upgrade team branding
2. Improve media coverage
3. Revitalize in-stadium promotion program
<table>
<thead>
<tr>
<th>Position</th>
<th>Objective</th>
<th>Key Results</th>
</tr>
</thead>
</table>
| **General Manager** | Generate 300-yards-per-game passing attack                              | 1. Achieve 65% pass completion rate  
2. Cut interceptions to fewer than 1 per game  
3. Hire new quarterback coach              |
| **SVP of Marketing** | Fill home stands to 90% capacity                                          | 1. Upgrade team branding  
2. Improve media coverage  
3. Revitalize in-stadium promotion program |
| **Publicist**    | Revitalize our in-stadium promotion program                              | 1. Arrange for players to attend two charity events per season  
2. Invite 20 sports reporters to meet and greet  
3. Share photos of events on social media |
| **Merchandise Manager** | Revitalize our in-stadium promotion program                              | 1. Contact 10 souvenir companies  
2. Price out 5 options  
3. Present 3 ideas for stadium giveaways by August 1 |

- **Offensive Coach**
  - **Objective**: Generate 300-yards-per-game passing attack
  - **Key Results**
    1. Achieve 65% pass completion rate
    2. Cut interceptions to fewer than 1 per game
    3. Hire new quarterback coach

- **Defensive Coach**
  - **Objective**: Give up fewer than 17 points per game
  - **Key Results**
    1. Allow fewer than 100 rushing yards per game
    2. Increase number of sacks to 3+ per game
    3. Develop a Pro Bowl cornerback

- **Special Teams Coach**
  - **Objective**: Improve to top 3 ranking for punt coverage team
  - **Key Results**
    1. Allow fewer than 10 yards per punt return
    2. Block 4+ punts over season
Objective
Deliver city services effectively, efficiently, and equitably

Key Results
Ninety-five percent of city services will be delivered by their established resolution time

Pushing Down Evaluation
## Pushing Down Evaluation

### Mayor
**Objective:** Increase neighborhood stability  
**KR:** Increase compliance of violations by comply by date by 15 percentage points.

### Deputy Mayor

<table>
<thead>
<tr>
<th>Position</th>
<th>Objective</th>
<th>Key Results (KR)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Director of Code Enforcement</td>
<td>Educate public about codes.</td>
<td>Ensure that a Codes representative attends one public meeting in each quadrant each month.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Host one educational event per quarter</td>
</tr>
<tr>
<td>Administrative Assistant</td>
<td>Host one educational event per quarter</td>
<td>Identify and project plan all 2020 educational events.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Get 200 Healthy Housing 101 participants in Sept.</td>
</tr>
<tr>
<td>Director of Code Enforcement</td>
<td>Achieve compliance through both carrot and stick methodologies.</td>
<td>Department issues 50 BAA tickets per week</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Develop landlord support program by 9/1.</td>
</tr>
<tr>
<td>Housing Inspector</td>
<td>Department issues 50 tickets per week</td>
<td>Flag 5 cases/week that could be referred to BAA</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Write an average of two BAA tickets per week</td>
</tr>
</tbody>
</table>
Questions?
Next Steps

**Week 7:** Racial Equity and Community Engagement
90 minute session

Thursday, July 16, 3:00–4:30 p.m. ET
Add it to your calendar [here](#).
Webinar Opportunity

On **Wednesday, July 29th** at **1PM ET** WWC and ChangeLab Solutions will host a webinar on **Moving Forward: Ensuring Housing Stability and Promoting Equity in COVID-19 Response and Recovery**. If you’re interested in joining, please register [here](#). Feel free to share with partners, colleagues, etc.

If you missed the July 1st webinar, you can watch the video recording [here](#).
Thank you for attending the webinar. Any questions?
Email CitySolutions@Results4America.org