



Date: October 21, 2015
To: Patrick H. West, City Manager *T.H.W.*
From: Amy J. Bodek, Director of Development Services *AJB*
For: Honorable Mayor and Members of the City Council
Subject: Results of Research on Proactive Rental Housing Inspection Program

Since 1966, the City's Health and Human Services Department has operated a proactive inspection program for properties consisting of four or more residential rental units. This program was designed to ensure that the City's rental housing complies with standards for health, safety, and welfare of the public in compliance with California Health and Safety Code Section 17920. This proactive program incorporates annual inspection fees to help offset the costs of enforcement as provided for in California Health and Safety Code Section 17951. In FY13, this proactive inspection program was transferred to the Code Enforcement Division in the Department of Development Services (Department) as part of the City's Government Reform efforts to centralize similar services.

On June 23, 2015, the City Council adopted an ordinance amending the Long Beach Municipal Code by adding chapter 18.30 relating to a Proactive Rental Housing Inspection Program (PRHIP). In addition to codifying the existing PRHIP program, the City Council requested staff to report back to Council with findings related to: a comprehensive outreach program to educate both tenants and landlords; a list of unresponsive non-compliant landlords; a statistical report to show the number of triplexes and duplexes; a method for collecting good data on units inspected; and a report on incentives to reduce the number of inspections for compliant landlords. The following report will provide an overview of these items for Council information.

I. PRHIP Outreach Program – Request for Proposals

In addition to the tenant rights and responsibilities brochure prepared by the Department for distribution by landlords and explanatory door hangers left at inspection sites by inspectors, City Council requested that a comprehensive outreach program be developed to educate both tenants and landlords about their rights and responsibilities, and PRHIP. This outreach program is intended to encourage participation in PRHIP and will be specifically targeted at non-English speakers and other residents who may have difficulty or reluctance in utilizing code enforcement services.

Staff developed a Request for Proposals (RFP) seeking a consultant or consultant(s) to provide an outreach program to strengthen awareness of

PRHIP. The selected consultant will work with the Apartment Association of Southern California and tenants' right groups, and utilize outreach materials developed by staff, including tenant and landlord information brochures. These materials were previously provided to the City Council via a separate memo on September 16, 2015 and are currently available for circulation. The outreach RFP was released on September 28, 2015, with a submission deadline of October 21, 2015. The consultant(s) will be selected on or about December 2015.

II. List of Unresponsive & Non-Compliant Landlords

City Council requested a list of unresponsive and noncompliant landlords. Staff has been advised by the City Attorney that publishing names of landlords who have received citations, but have not been charged with formal nuisance charges, may lead to defamation charges and/or other litigation against the City. At this time, the Department is providing to City Council a list of properties grouped by owner, in no particular order. Landowner names have been redacted. Code Enforcement staff has identified these owners as having frequent interactions with Code Enforcement and a large number of violations. This list contains the properties owned, as well as the number of cases opened and number of violations found in the last five years.

Since it is feasible that this list can change over the course of several months as upgrades and repairs become complete, staff will update this list annually. The list of owners and the information on their properties is provided in Attachment A.

III. Cost Estimate and Fee Structure

The City of Long Beach contains approximately 7,500 residential rental properties containing 4 or more housing units. These properties comprise approximately 67,500 residential rental units. A map of locations of these rental properties can be found in Attachment B. This information represents the best and most current estimate based on an extensive review of assessor parcel records, building permits and business license records. However, absent a physical citywide survey, this number remains an educated estimate. Improved data collection methods may result in more accurate counts of properties and units subject to PRHIP inspections. If there are significant changes, staff will adjust the cost estimate and per-unit fees after program implementation in order to ensure full cost recovery, as well as avoid overcharging.

For the last three years, the PRHIP fees have generated an average of \$1,735,000 in annual funding to support the program. This revenue offsets program costs for 11.2 full-time equivalents (FTE), consisting of 9.0 FTE for inspectors and 2.2 FTE for managerial, administrative, and clerical staff, in addition to non-personnel costs including materials, supplies, and internal support.

From July 2014 through June 2015, 3,400 inspection cases were completed for multi-family rental properties, consisting of 1,500 proactive inspection cases and 1,900 complaint-based cases at multi-family rentals. Multiple inspections are often necessary for each case in order to ensure full code compliance. The City's current database system does not readily allow counting of the total number of inspections, so each closed case is assumed to represent one unique building. The number of cases thus represents the most reliable record of inspections available. From July 2014 to June 2015, approximately 45% of the total residential rental properties subject to PRHIP were inspected. Staff has begun to collect additional data on the number of units and number of inspections at each property, which should aid in future updates to the program.

The current multi-family housing inspection fee is based on a flat fee for tiers of properties containing 4-10 units, 11-20 units, and 21+ units, as shown below. Additional flat fees are imposed on other multi-unit categories including hotels and motels, rooming houses, and bed & breakfasts.

Category	Fee Per Parcel	Number of Parcels (approx.)
4-10 units	\$230	6,120
11-20 units	\$260	1,060
21+ units	\$290	320

Staff has prepared an analysis of the programmatic steps and associated costs in order to estimate the total costs of expanding the program from its current capacity of 3,400 properties annually to the full cohort of 7,500 4+ unit residential rental properties annually. An expanded Proactive Rental Housing Inspection Program that conducts annual inspections of all 7,500 4+ unit residential rental properties in the city would require 25 full-time equivalent staff as seen in Attachment C.

Based on a total cost of \$4,531,000 and a total of 67,500 units, each property owner would be required to pay \$67 per unit in the first year of the program to fully recover costs. For all ensuing years, one-time set-up costs would not be incurred. Ongoing costs total \$4,252,000 annually and require a \$63 per unit fee for full cost recovery.

This proposed per-unit fee redistributes the burden imposed on small, medium, and large multi-family residential rental properties. Under a flat per-unit fee, large residential rental properties will pay for a larger portion of the total program costs than under the existing fee structure. For example, in the first year, an owner of a 4-unit rental property will pay \$268, while an owner of a 50-unit residential rental property will pay \$3,350.

For a more detailed estimate of the costs of program implementation for 4+ unit properties, as well as for Duplex and Triplex properties, and the fees required for full cost recovery, please see Attachment C – Cost Estimate. Staff will pursue changes in the City’s Master Fee Schedule to implement the new fee structure in the next few months, once staff has reached out to community stakeholders and apartment owners to discuss these proposed changes. Additionally, staff will look at the impact of raising fees in the middle of a billing cycle to determine the optimal time to implement the new fee schedule.

IV. Triplexes and Duplexes

On June 2, 2015, City Council also requested a statistical report showing the number of triplexes and duplexes. Staff has prepared maps showing the counts of properties and units that fall into these categories. These maps can be found in Attachment D.

According to the Los Angeles County Assessor, the City of Long Beach contains approximately 2,060 lots containing 3 units, for a total of approximately 6,180 dwelling units, as well as approximately 7,350 lots with 2 dwelling units, comprising a total of approximately 14,700 total dwelling units. However, the count of 2-unit lots may not entirely consist of duplex properties. A duplex is defined as “a building containing two dwelling units.” Two units on a parcel may consist of a typical duplex property, in which both units are attached, approximately equal in size, and are separately occupied. On the other hand, the two units may also consist of a single-family home plus an accessory unit as permitted by the Municipal Code. In comparison to 4+ unit residential properties, it is less likely that a duplex or triplex property is operated as a residential rental property. This presents a challenge in easily identifying the set of duplexes and triplexes where proactive rental inspections should be conducted.

Property Type	Properties	Units
Triplex	2,060	6,180
Duplex	7,350	14,700

Occupant status is another challenge associated with 2- and 3-unit properties. In many cases, one or more of the dwelling units at these properties are owner-occupied. Because of this, the City does not include 3-unit and 2-unit properties as “residential rental properties” for income purposes and does not require owners of these properties to obtain a business license. The current PRHIP ordinance only applies to residential rental properties, defined as “a property or building or portion of a building on a parcel of land where the parcel of land includes at least four units that is rented or leased to tenants for residential purposes.” Amendments to the Municipal Code may be necessary in order to include triplexes and duplexes in this category so that they will be subject to PRHIP. These

amendments would also require triplex and duplex owners to obtain business licenses.

Staff anticipates that these changes will require additional staffing and material costs to register and enforce the additional business licenses. These additional costs are presented in greater detail in Attachment C. Additionally, since triplexes and duplexes are currently not required to obtain licenses, and due to the difficulty in determining the true number of rental triplex and duplex properties, the Department of Financial Management predicts a high rate of delinquent payments.

The number of duplex properties in the City is roughly equal to the number of 4+ unit rental properties (7,350 vs. 7,500). As shown in the table below, inspecting triplexes and duplexes, in addition to all 4+-unit rental properties, annually increases the number of properties subject to PRHIP by over 125%, while increasing the number of units inspected by only 31%.

Property Types	Properties	Units
Total, 4+	7,500	67,500
Total, 4+ & Triplex	9,560	73,680
Total, 4+, Triplex, & Duplex	16,910	88,380

Staff also took the next logical step and estimated the cost and per-unit fee necessary to conduct annual inspections of all triplexes and duplexes, in addition to the inspections of 4+ unit rental properties. It is important to note that due to the difficulties in determining which triplex and duplex properties would be subject to PRHIP, these costs represent a worst-case scenario in which all properties containing 2 or 3 units are subject to the program. The total program cost is largely proportional to the number of properties that are subject to the program.

Program Capacity	Program Cost (Ongoing)	Per-Unit Fee (1st year)	Per-Unit Fee (Ongoing)
4+ Unit Properties	\$4,351,000	\$67	\$63
4+ Unit Properties & Triplexes	\$5,462,000	\$80	\$74
4+ Unit Properties, Triplexes, & Duplexes	\$9,970,000	\$124	\$113

Analysis of personnel needs and program costs were based on an assumption that all properties require the same amount of time to conduct inspections. Based on current inspection levels, staff estimates that conducting annual inspections of all 9,570 4+ unit residential rental properties, as well as triplexes, would require a staff of 31 FTE. To conduct annual inspections of all 16,910 4+ unit residential rental properties, triplexes, and duplexes, staff estimates 58 FTE would be required. Additionally, staff has analyzed administrative and clerical tasks, as well as

non-personnel costs, in order to estimate the total annual program cost to the City.

The total estimated costs and associated fees are presented in Attachment C – Cost Estimate. Given the challenges in determining the true number of rental triplex or duplex properties, whether the properties should be considered commercial investment properties even if one of the units is owner-occupied, and considering the impacts to the Business License Division related to their own inspections, staff does not recommend expanding the PRHIP to triplexes or duplexes at this time.

Furthermore, PRHIP is a key component of the code enforcement program that is designed to supplement the existing reactive Code Enforcement program. The Department assigns multiple inspectors citywide to respond to complaint-based cases at all other property types not subject to PRHIP, including triplexes, duplexes, and single-family homes.

V. Collecting Good Data

As of June 2015, Code Enforcement staff has begun collecting additional data during routine inspections of multi-family rental properties. This data includes the number of units at each property inspected, number of doors knocked on at each property, and the number of units that allowed entry for an inspection. In concert with the existing records kept in the Code Enforcement database, this supplemental data will help to track the progress of PRHIP inspections, as well as provide insight into the effectiveness of outreach efforts.

Furthermore, staff is exploring the changes necessary to begin keeping data in the existing database by creating separate cases for each unit within a property. Currently, a single case is generated for each property address, regardless of the number of units present at that property. Staff anticipates that this will provide greater data resolution, as well as improve tracking ability over the existing case record keeping system.

VI. Proactive Inspection Prioritization Tool

City Council asked for a tool to identify and prioritize inspections to areas of the city that contain factors that contribute to unsafe and unhealthy rental housing. The following factors were mapped to create a composite priority score for each Census Tract in the City:

- The number of prior PRHIP cases from 2010-2014;
- The number of rental properties;
- The median age of rental properties;
- The percentage of population below poverty level; and
- The rate of severe overcrowding, defined as having 1.51 or more persons per room.

Staff analyzed recent data and assigned a score to each census tract for each of the five factors, with a maximum of three points for tracts having a high priority in that factor. Each tract could thus receive a score of up to 15 points. Tracts with a score greater than 11 points on this rating system were identified as high priority.

The presence of prior code violations, particularly in areas with densely concentrated rental housing properties, indicates a high priority area for immediate inspection. Older rental properties are more likely to have fallen into disrepair and are more likely to contain lead paint and/or asbestos-containing materials. High rates of severe renter overcrowding increase the wear and tear on housing units, as well as intensify the health impacts of unhealthy housing. The Department will focus on delivering inspection services at properties that are at highest risk of containing building and health code violations, as well as quickly remedying code violations for those who are most vulnerable to adverse health and safety impacts caused by these violations.

A map of identified priority areas based on an overlay analysis of these factors, as well as maps containing the individual data layers, can be found in Attachment E.

VII. Incentive Programs

Lastly, the City Council requested a report on incentives to reduce the number of inspections for compliant landlords. Staff researched other California cities that operate a proactive rental inspection program and reviewed the incentive programs that they offer to landlords. Ordinances adopted by the cities of Anaheim, Santa Ana, Sacramento, Santa Cruz, and San Jose include incentive programs aimed at both encouraging consistent maintenance of rental units by landlords, as well as relieving some of the workload by city staff, which may work to reduce overall costs of the program. Proactive rental inspection programs often require a large number of personnel and high annual costs.

Incentive programs in other cities vary in structure and have unique features depending on that city's housing issues, as well as the structure of their proactive rental inspection program. These incentives generally offer landlords relief from the program in the form of reduced or waived fees, as well as reduced frequency of or full exemptions from routine inspections. Most programs are funded solely or in part by fees charged to property owners, though many cities, including Anaheim, Sacramento, and Santa Ana, do not achieve full cost recovery through annual program fees and may partially or fully support the proactive rental inspection program through the City's general fund.

When compared side-by-side with proactive rental housing inspection programs in peer cities, PRHIP stands out as having both a high volume of

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units subject to inspection, as well as a high frequency of routine inspections. Further analysis would be necessary to develop a program for Long Beach that works within the City's ordinance and is tailored to the city's issues.

An overview of the proactive inspection programs operated by peer cities, their associated fee structures, and incentive programs can be found in Attachment F – Peer Cities Incentive Programs.

For further information regarding PRHIP, please contact Angela Reynolds, Deputy Director of Development Services, at ext. 8-6369.

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Attachment A: List of Properties Owned by Non-Compliant Landlords
Attachment B: Map of 4+ Unit Residential Rental Properties
Attachment C: Cost Estimate Summary Table
Attachment D: Maps of Triplex and Duplex Residential Properties
Attachment E: Prioritization Tool and Layer Maps
Attachment F: Matrix of Peer Cities' Incentive Programs

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Attachment A - List of Properties Owned by Non-Compliant Landlords (Names Redacted)

Owner	Property Address	Cases, 2011-2015	Violations, 2011-2015
Landlord 1	1035 Martin Luther King Jr.	3	5
	1336 Walnut Ave.	4	21
	1334 Walnut Ave.	7	41
	904 Alamos Ave.	2	44
	1625 E. 15th St.	3	2
	900 Alamos Ave.	2	0
	1625 E. 5th St.	3	2
	1074 E. Market St.	3	2
	1080 E. Market St.	3	35
	2042 Pine Ave.	1	0
	1020 E. 12th St.	1	2
	1929 Pine Ave.	6	28
	1032 Olive Ave	2	24
	465 Almond Ave.	1	5
	1027 E Hill St.	3	24
	2285 Lewis Ave.	2	10
	1109 E 4th St.	1	4
	1980 Harbor Ave.	3	5
	940 Olive Ave.	3	37
	1127 Raymond Ave.	1	27
221 E. Burnett St.	1	14	
628 E. 53rd St.	6	19	
165 E Market St. 1	1	1	
1425 E. Hellman St.	3	22	
127 E Louise St.	3	13	
1711 Chestnut Ave.	1	2	
	TOTAL	69	389
Landlord 2	333 Orange Ave.	9	57
	412 Zona Ct.	3	1
	801 Alamos Ave.	5	29
	943 Washington Pl.	4	27
	6796 N Paramount Blvd.	1	0
	1000 E 10th St.	6	57
	324 W 7th St.	6	38
	TOTAL	34	209
Landlord 3	728 Cerritos Ave.	4	25
	532 Nebraska Ave	6	25
	1045 E. 4th St.	5	46
	283 Redondo Ave	5	11
	1229 E. 4th St.	6	66
	TOTAL	26	173
Landlord 4	208 W. 6th St.	5	5
	339 Daisy Ave.	7	57
	345 Daisy Ave.	6	42
	853 Pacific Ave	3	26
	701 Pacific Ave.	8	103
	TOTAL	29	233

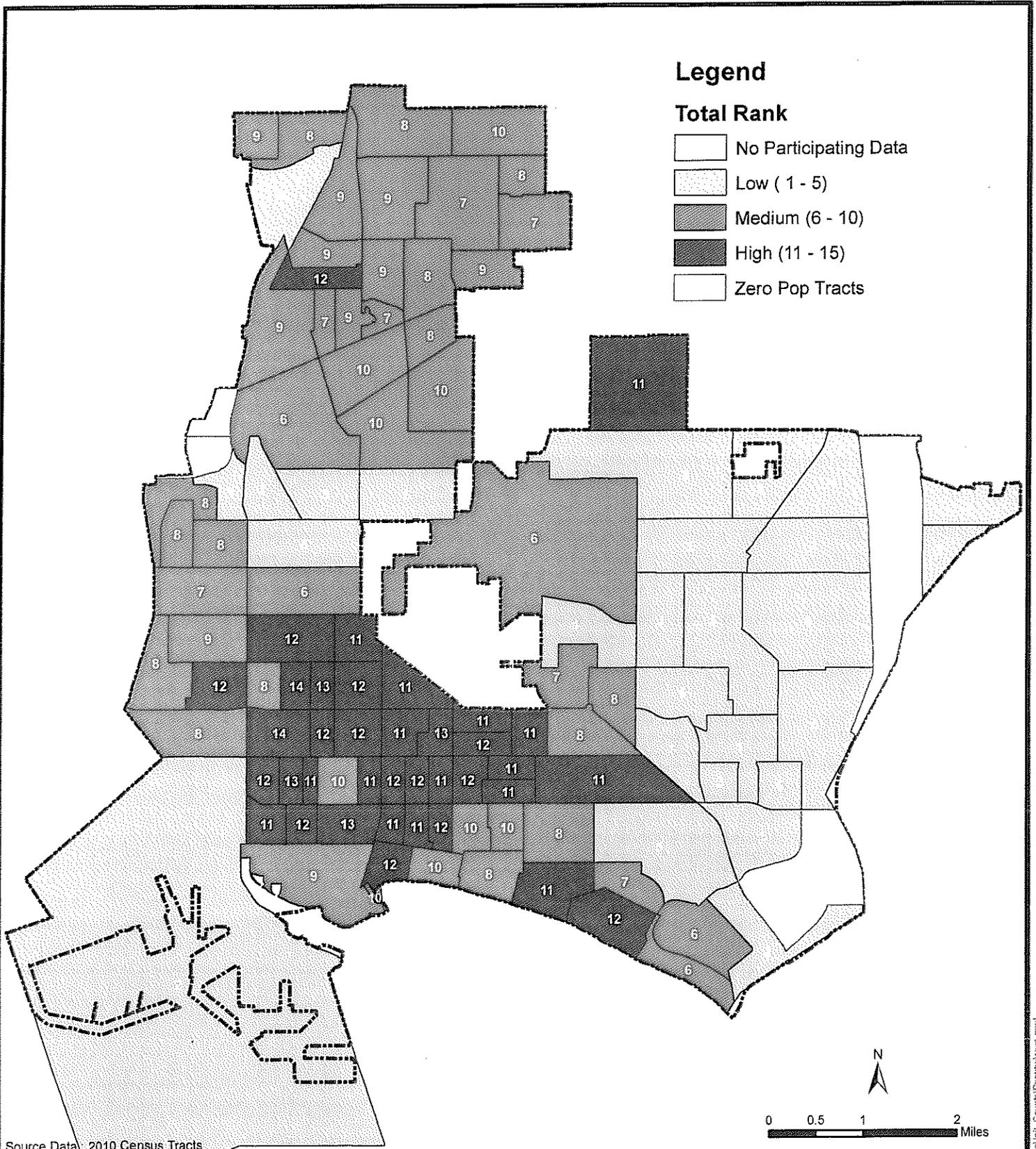
Attachment C - Cost estimate Summary Table

	Current Program (Annually)		All 4+ Unit Properties (Annually)		4+ Unit, Triplex Properties (Annually)		4+ Unit, Triplex, & Duplex Properties (Annually)	
	FTE	Cost	FTE	Cost	FTE	Cost	FTE	Cost
NUMBER OF PROPERTIES INSPECTED	3,401		7,510		9,570		16,918	
NUMBER OF UNITS	30,500		67,440		73,620		88,316	
COSTS								
PERSONNEL AND LABOR								
Management, Administrative, & Clerical Staff								
Deputy Director	0.28	\$ 68,789	0.28	\$ 68,789	0.28	\$ 68,789	0.28	\$ 68,789
Code Enforcement Officer	0.28	\$ 48,288	0.28	\$ 48,288	0.28	\$ 48,288	0.28	\$ 48,288
Administrative Analyst III	0.78	\$ 100,562	1.72	\$ 222,102	2.19	\$ 283,025	3.88	\$ 500,337
Clerk Typist III	1.20	\$ 90,298	2.84	\$ 212,869	3.58	\$ 269,806	6.24	\$ 468,333
Accounting Clerk III	0.14	\$ 11,899	0.32	\$ 25,834	0.40	\$ 32,921	0.71	\$ 58,197
SUBTOTAL	2.69	\$ 319,857	5.44	\$ 577,883	6.74	\$ 701,829	11.40	\$ 1,143,944
Inspection Staff								
Environmental Health Specialist IV	0.99	\$ 116,012	1.64	\$ 192,955	1.97	\$ 231,530	3.14	\$ 369,124
Principal Building Inspector	-	\$ -	1.48	\$ 203,393	1.79	\$ 246,493	2.91	\$ 400,234
Senior Building Inspector	-	\$ -	1.87	\$ 238,154	2.35	\$ 299,271	4.05	\$ 517,275
Combination Building Inspector	2.03	\$ 229,490	3.49	\$ 395,025	4.41	\$ 499,667	9.60	\$ 1,087,769
Combination Building Inspector Aide II	5.51	\$ 489,028	11.19	\$ 992,588	14.22	\$ 1,261,996	26.95	\$ 2,391,194
SUBTOTAL	8.52	\$ 834,531	19.66	\$ 2,022,115	24.74	\$ 2,538,957	46.64	\$ 4,765,596
TOTAL	11.21	\$ 1,154,187	25.09	\$ 2,599,998	31.48	\$ 3,240,786	58.04	\$ 5,909,541
MATERIALS AND SUPPLIES								
Building and Land Rentals ¹		\$ 166,000		\$ 371,912		\$ 466,529		\$ 860,223
PRHIP Outreach Program		\$ 75,000		\$ 75,000		\$ 100,000		\$ 170,000
Other Materials and Supplies		\$ 41,947		\$ 116,676		\$ 146,359		\$ 269,869
TOTAL		\$ 282,947		\$ 563,588		\$ 712,889		\$ 1,300,091
INTERNAL SERVICE CHARGES								
Fleet		\$ 61,992		\$ 137,760		\$ 172,200		\$ 323,736
Technology Services ²		\$ 73,846		\$ 197,066		\$ 246,189		\$ 443,551
Billing & Collections		\$ 129,336		\$ 289,769		\$ 363,488		\$ 670,227
Health MOU		\$ 108,000		\$ 108,000		\$ 108,000		\$ 108,000
General Overhead Expenses		\$ 167,866		\$ 376,137		\$ 471,829		\$ 869,994
TOTAL		\$ 541,059		\$ 1,108,731		\$ 1,361,706		\$ 2,415,509
BUSINESS LICENSE COSTS³								
Business Licensing Staff		\$ -		\$ -	1.50	\$ 131,814	2.50	\$ 223,917
Materials, Supplies, Postage, & Internal Charges		\$ -		\$ -		\$ 34,616		\$ 140,408
TOTAL		\$ -		\$ -		\$ 166,430		\$ 364,325
ONE-TIME STARTUP COSTS								
New Vehicles		\$ -	11	\$ 276,188		\$ 426,836	40	\$ 1,004,320
Template and Database Creation		\$ -		\$ 2,473		\$ 3,710		\$ 4,946
TOTAL		\$ -		\$ 278,661		\$ 430,546		\$ 1,009,266
TOTAL PROGRAM COSTS								
1st Year		\$ -		\$ 4,550,978		\$ 5,912,366		\$ 10,998,732
Annual, Ongoing		\$ 1,750,174		\$ 4,272,317		\$ 5,481,811		\$ 9,989,466
FEE REQUIRED FOR COST RECOVERY								
1st Year		\$ -		\$ 67		\$ 80		\$ 125
Annual, Ongoing		\$ 26		\$ 63		\$ 74		\$ 113

¹ Costs for current program use FY14 Actual Expenditures for Materials & Supplies and FY16 Adopted Budget for items not in FY14

² Internal service charges based on FY16 adopted budget

³ Business License costs based on estimates from Financial Management Department



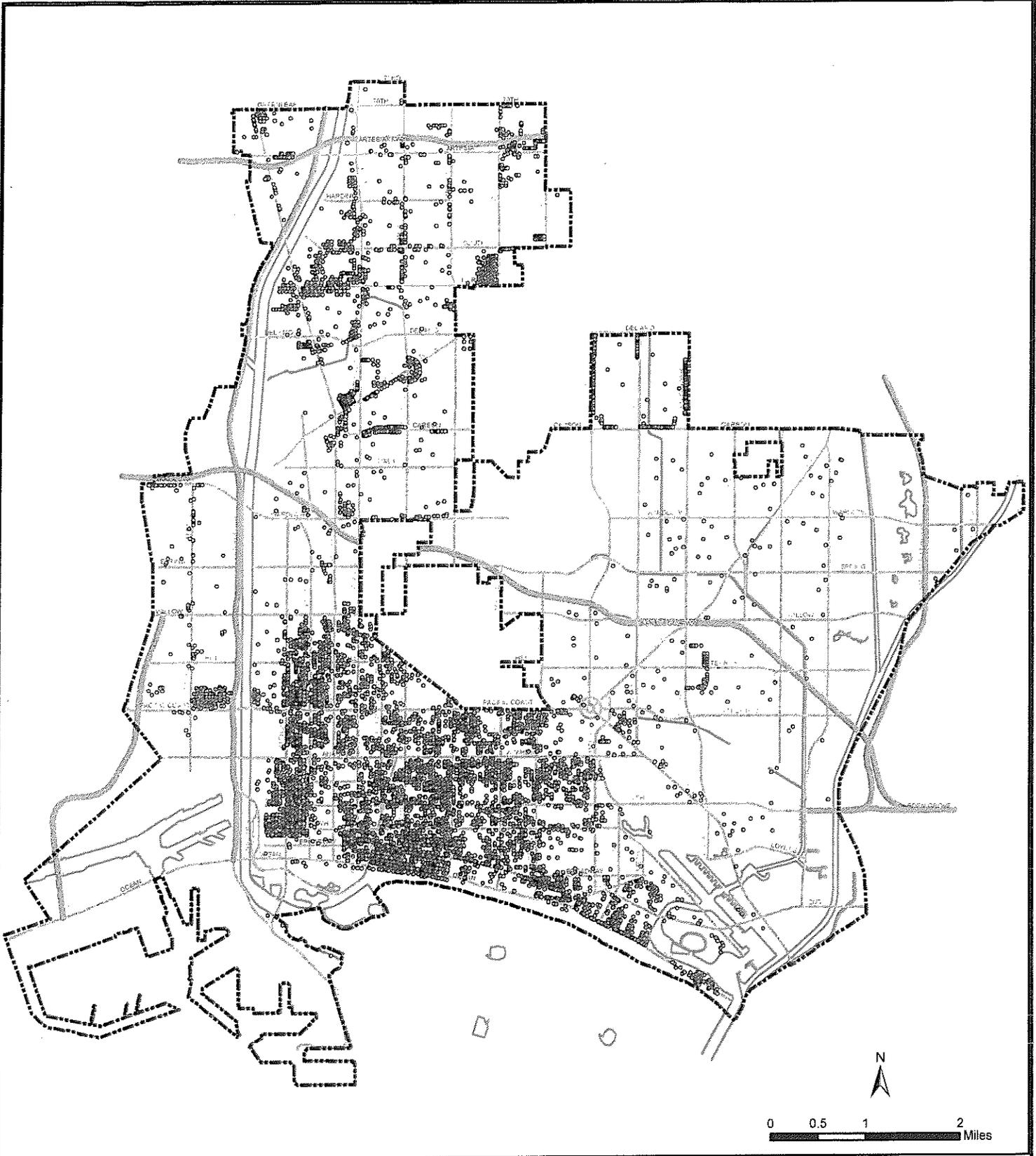
Source Data: 2010 Census Tracts



City of Long Beach

PRHIP Priority Areas

Factors equally weighted: Number of PRHIP Cases 2010-2014,
 Number of Rental Properties, Median Age of Rental Units,
 Poverty Rate, Severe Overcrowding Rate

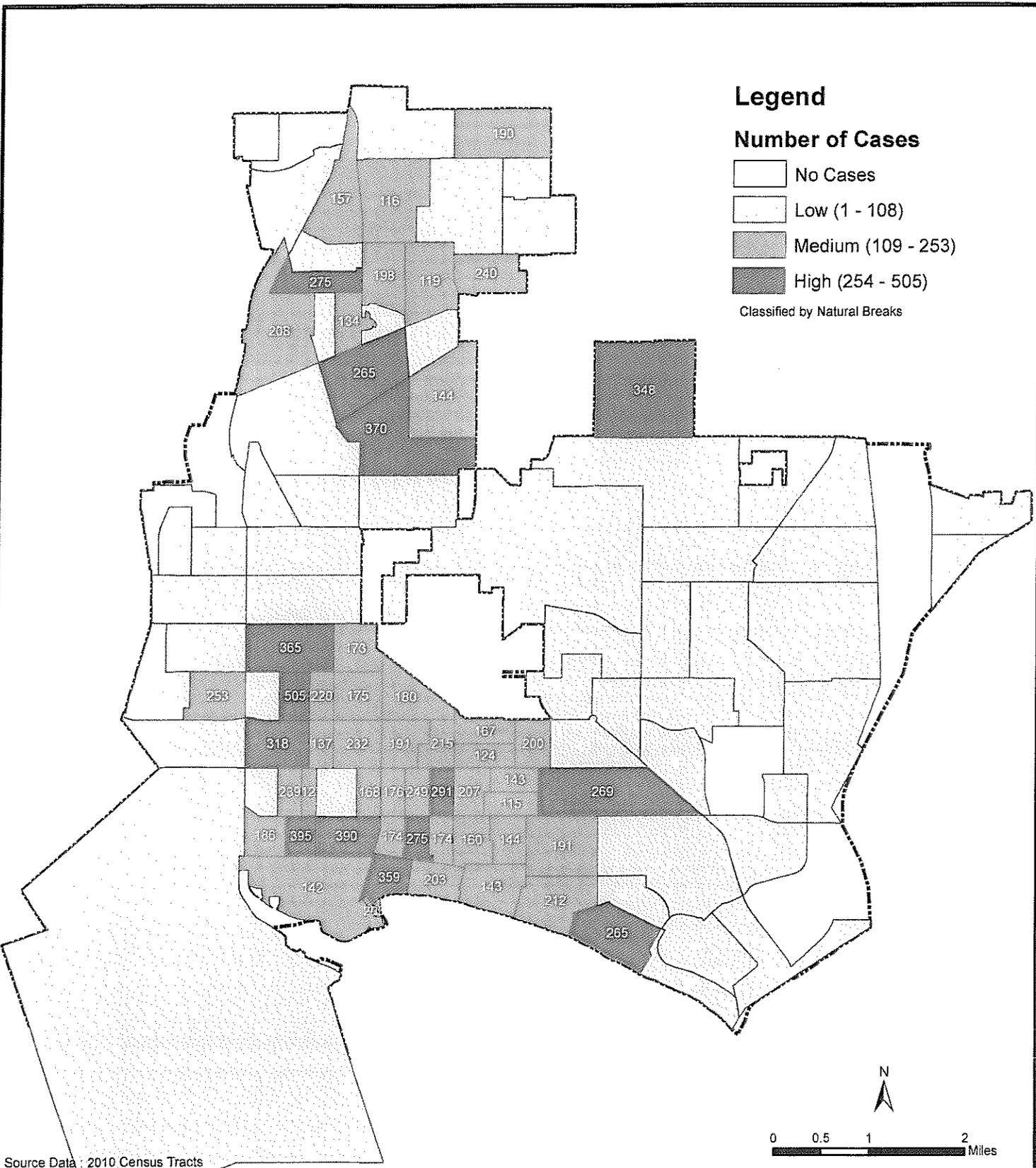


City of Long Beach

2010-2014 Proactive Rental Housing Inspection Program (PRHIP) Cases

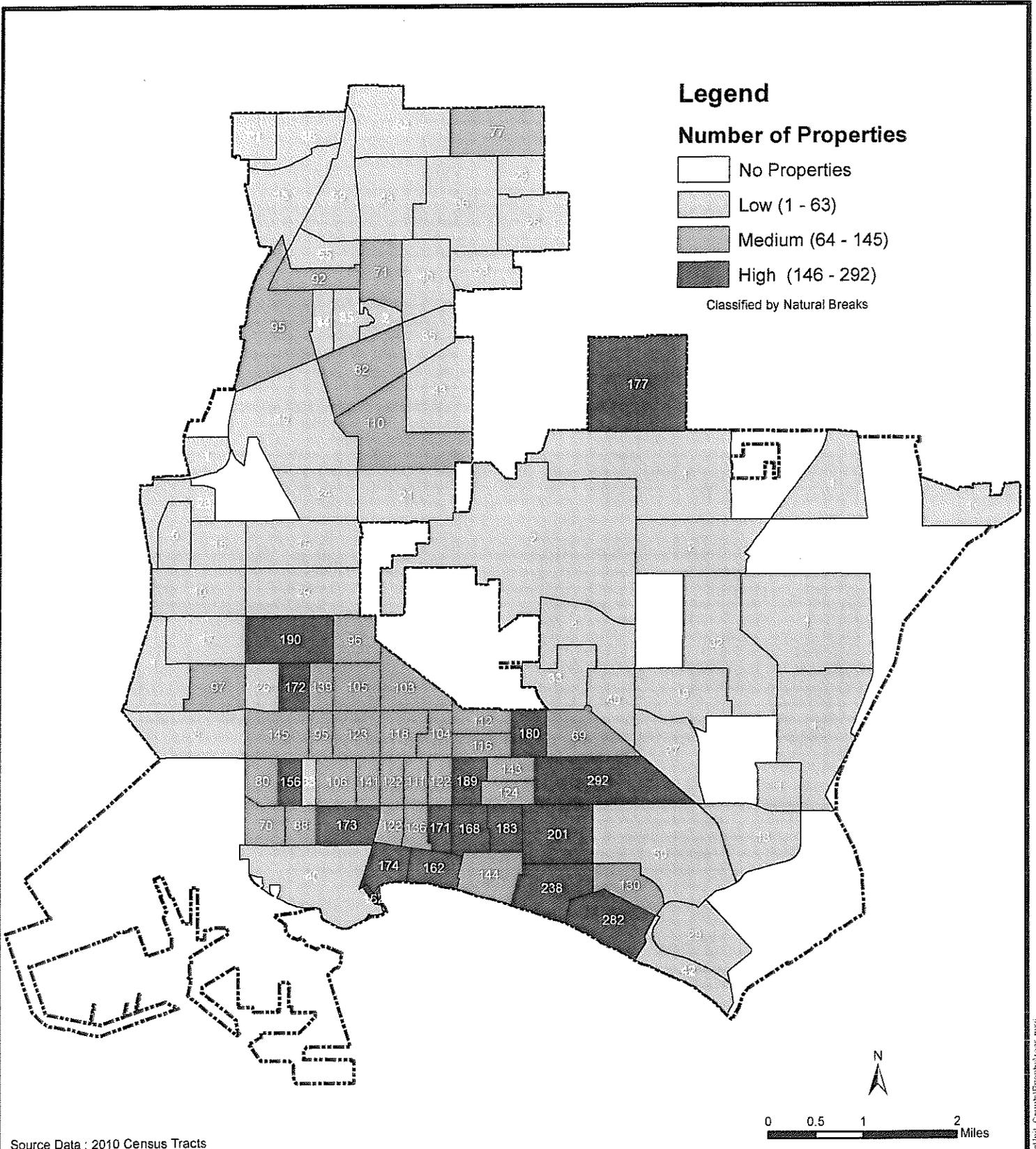
Source Data : Development Services,
Land Management & Revenue System





City of Long Beach
2010-2014 Proactive Rental Housing
Inspection Program (PRHIP) Cases
By Census Tract

Source Data : Development Services,
 Land Management & Revenue System

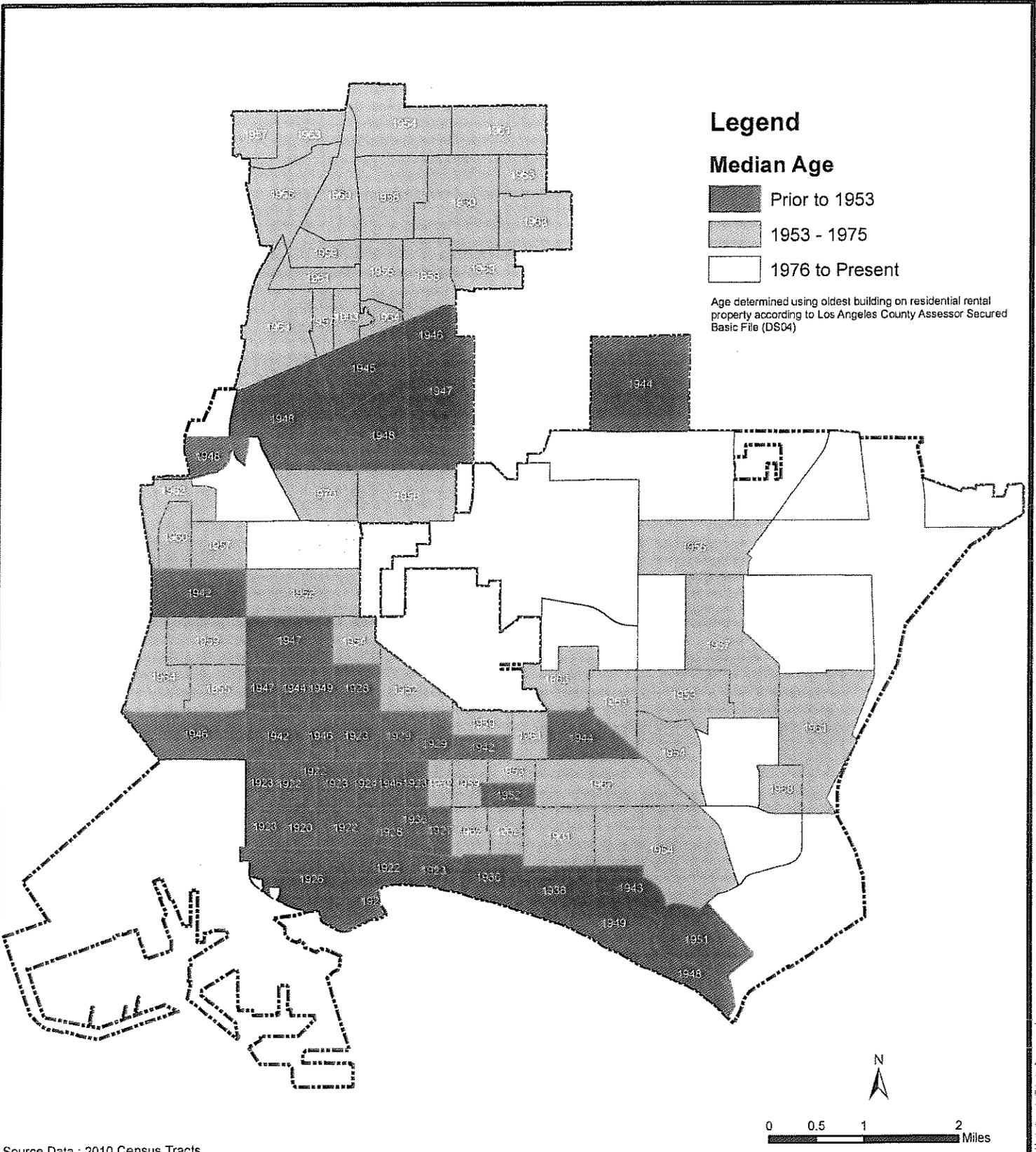


City of Long Beach

4 or more Dwelling Units By Census Tract

As of March 2015

Source Data : Los Angeles County Assessor Office
Secure Basic File (DS04) March 2015

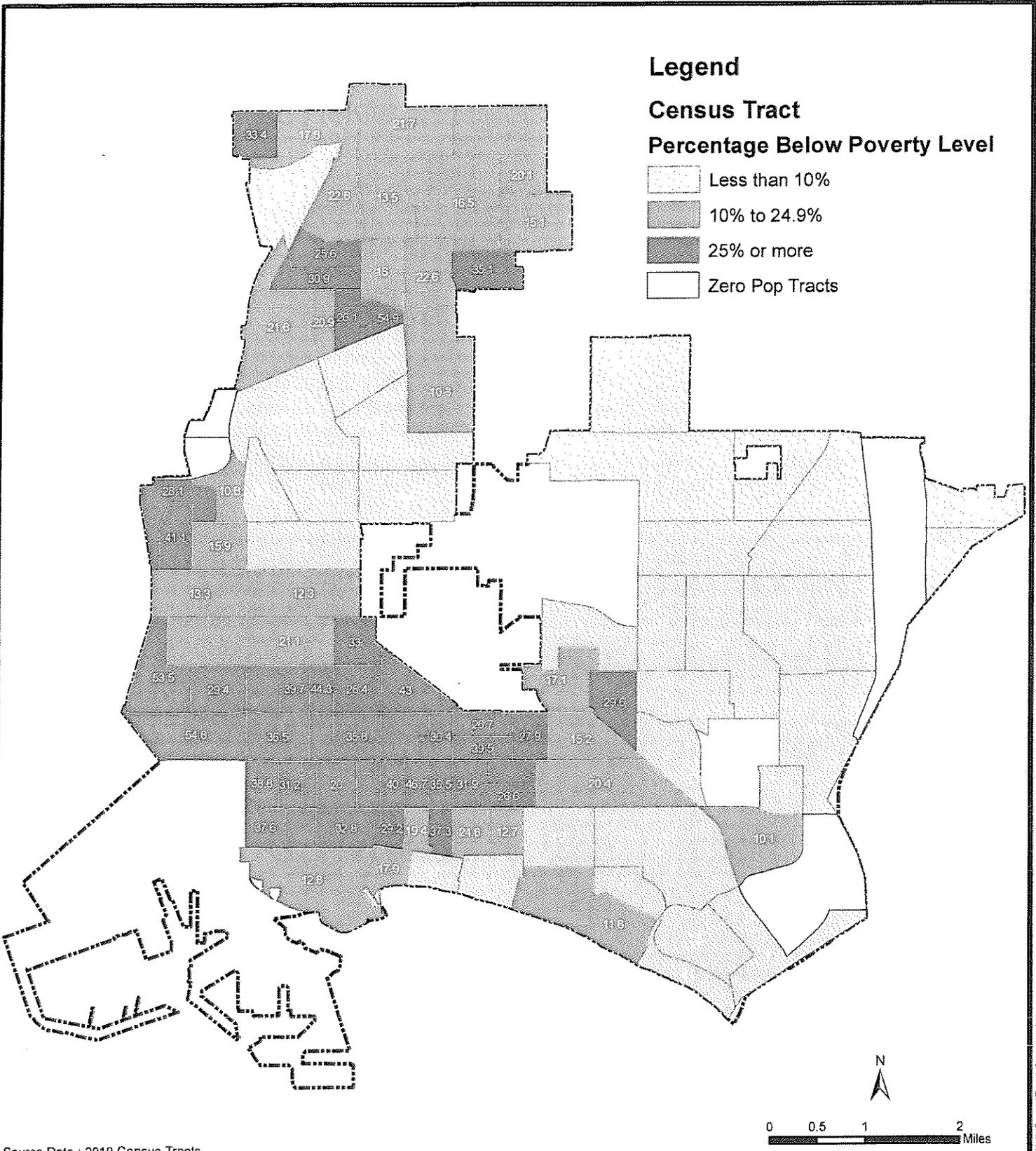


Source Data : 2010 Census Tracts



City of Long Beach Median Age of Residential Rental Properties By Census Tract

Source Data : Los Angeles County Assessor Office
Secure Basic File (DS04) March 2015

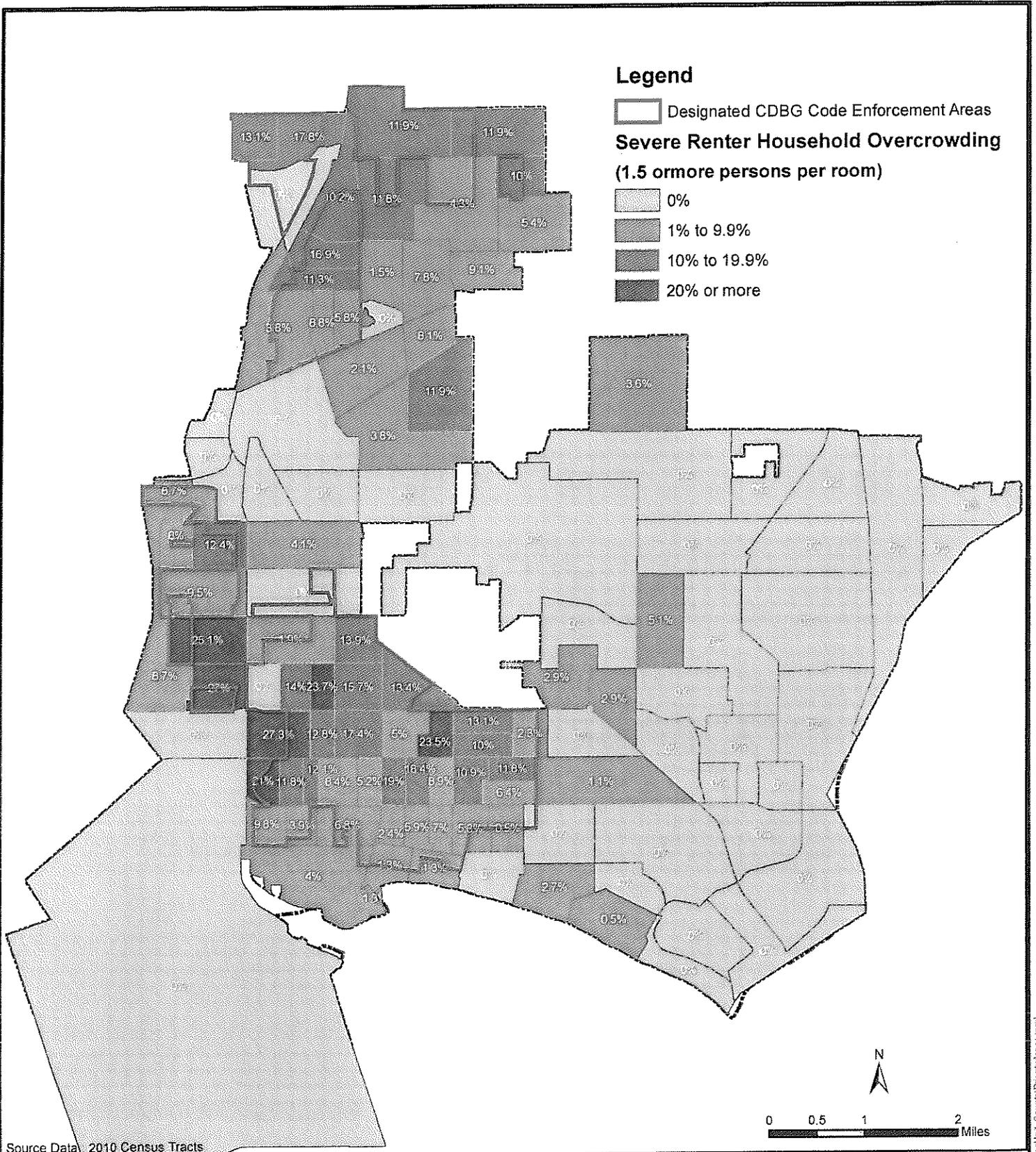


City of Long Beach Percentage of Population Below Poverty Level

American Community Survey 2008-2012

Source:
U.S. Census Bureau, 2008-2012 American
Community Survey Census Table B17001

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City of Long Beach

**Severe Renter Household Overcrowding
and Designated CDBG Code Enforcement Areas**



Attachment F – Matrix of Peer Cities' Incentive Programs

	Long Beach Proactive Rental Housing Inspection Program	Anaheim Quality Rental Housing Program	Sacramento Rental Housing Inspection Program	San Jose Multiple Housing Program	Santa Ana Proactive Rental Enforcement Program	Santa Cruz Rental Inspection Program
Properties Subject	4+ Unit rental properties	5+ Unit rental properties	All rental units	Apartments, hotels, motels, fraternities, sororities, shelters, residential care facilities	All rental units	All rental units
# Properties (Units)	7,510 properties, 67,440 units	2,900 properties, 40,500 units	23,500 units (approx.)	6,740 properties, 92,400 units	32,277 units	11,500 units
Frequency of Inspections	Annual	5-year cycle	1 initial inspection,, followed by annual random inspections of 10% of all rentals	Tier 1: 6 years Tier 2: 5 years Tier 3: 3 years	4-year cycle	Periodic – Unspecified
Annual Program Fee	Tiered Property Fees: 4-10 Units \$230, 11-20 Units \$260, 21+ Units \$290 Proposed Per-Unit Fee: \$64/unit, ongoing	None. Program fully funded by General Fund (\$420,000)	\$16 per unit	Per-Unit Fee by Tier: Tier 1 \$28.47 Tier 2 \$59.20 Tier 3 \$102.67	\$19.50 per unit	\$45 per building on property
Incentive Program	None	Safe Home Certificate: Issued if the landlord (1) employs 90% of best management practices, (2) submits all forms on time, (3) certifies that all housing units are safe, and (4) passes an initial exterior inspection by the City. The property is exempt for 5 years.	Self-Certification program: If inspector has found no violations, the property owner is fully compliant, and has no delinquent payments, and follows best management practices. Landowner receives discount on RHJP fee.	Inspection Priority Tiering: All buildings are placed on a Multiple Housing Roster based on frequency of services provided and violations observed from 2000-2013. The tier is reviewed after the first inspection cycle.	Gold Seal Program: 5,640 units are qualified for the Gold Seal Incentive Program, in which properties which meet "standards of excellence" are exempted from the fee for a 3-year period. Gold Seal Program funded by General Fund, \$95,000	Self-Certification Program: allowed if landowners has established a record of passing inspections with no violations in previous three years. Self- certification must be completed annually. Landlord is charged a per-unit fee for 20% of the total number of units.
Inspection/ Reinspection Fee			\$127 for each unit inspected under the program	\$207.40		\$20/unit, 107/hour for reinspections