

# City of Portland, Oregon Bureau of Development Services

FROM CONCEPT TO CONSTRUCTION

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September 9, 2020

**TO:** Angela Butel, City Budget Office

FROM: Rebecca Esau, Director Rebecca Esau.

**Bureau of Development Services** 

**SUBJECT:** FY 2020-21 Fall Supplemental Budget Monitoring Process Cover Letter

Attached is the FY 2020-21 Fall Budget Monitoring Report for the Bureau of Development Services.

In light of the COVID-19 pandemic and its impact on the economy in Portland, there are financial risks and mitigation strategies which BDS would like to communicate which are being addressed through the budget monitoring process.

BDS is 98% funded by fees and charges for service, with the remaining 2% coming from the City's General Fund. As such, bureau revenues are highly susceptible to fluctuations in development activity and have been severely impacted by the pandemic. Future revenue collections will depend largely on the effectiveness of the national and local response to the virus, the timing of a vaccine, and the economic recovery. BDS convened its Financial Advisory Committee in August 2020 to obtain input on BDS' revenue outlook over the next five years. This information, as well as recent economic data and BDS' actual experience since the onset of the pandemic has informed an update to the BDS 5-Year Financial Plan. The FY 2020-21 Fall BMP submission includes a decision package reducing revenue projections in line with the revised expectations.

BDS has taken steps to reduce expenditures in response to the pandemic. Prior to COVID-19, BDS had implemented a hiring freeze which continues to be in place. Citywide cost savings measures, including mandatory furloughs and freezes on COLA adjustments and merit increases for non-represented employees are applicable to BDS, as well as similar measures for represented employees as negotiated by union agreements. The bureau has also eliminated non-essential expenditures. This BMP submission includes a decision package reducing the bureau's budgeted personnel expenditures considerably through the removal of 53.0 FTE vacant positions.

The report includes the following requests:

#### 10895 – Revenue Projection Update

Due to the COVID-19 pandemic and its impact on the overall economy and development activity in Portland, revenue projections developed in January 2020 required an update. This adjustment brings BDS' revenue budget in line with the updated revenue projections.

#### 10910 – General Fund Reduction

This adjustment reduces General Fund Transfer to the BDS Neighborhood Inspections Program by \$30,000. The reduction brings BDS General Fund revenue in line with the FY 2020-21 Adopted Budget 5.6% General Fund reduction Citywide.

#### 10911 - Elimination of Vacant Positions

This adjustment reduces the BDS personnel budget through the elimination of 53.0 FTE vacant positions. Due to impact of COVID-19 on the overall economy and development activity in Portland, BDS does not expect to need these positions for the foreseeable future.

#### 10926 – Adjustment to IA with Facilities

This is a reduction of \$88,897 to the interagency agreement with Facilities for BDS due to a reduction in the FY 2020-21 Downtown Office Space Blended Rate resulting from a decrease in debt service payments.

#### 11020 - Adjustment to IA with BPS for BSA

This is an adjustment of \$18,000 to the interagency agreement with BPS for services provided by a Business Systems Analyst to the BDS Technology Support Team.

#### 11021 – Adjustment to Portland Clean Energy Fund IA with BPS

This is an adjustment of \$17,000 to the interagency agreement with BPS for work related to the Portland Clean Energy Fund, carrying forward a portion of the FY 2019-20 interagency amount to FY 2020-21.

If you have any questions about this BDS Budget Monitoring Report, please contact Kyle O'Brien, BDS Finance Manager, at 503-823-7323 or kyle.obrien@portlandoregon.gov.

#### F4 - BMP Amendment Request Report (Fall Requested)

Page 1 of 6 BMP Amendment Request Report Run Time: 10:04:55 AM

#### **DS - Bureau of Development Services**

**DP Type** 

Contingency

Run Date: 9/4/20

Request Name: 10895 -Revenue Projection Update

#### **Package Description**

Due to the COVID-19 pandemic and its impact on the overall economy and development activity in Portland, revenue projections required an update. This decision package brings BDS' revenue budget in line with the updated revenue projections.

#### **Service Impacts**

None

#### **Equity Impacts**

	2020-21 FALL Requested Adj
Contingency	-26,012,266
	2020-21 FALL Requested Adj
Charges for Services	-7,387,778
Licenses & Permits	-15,840,669

#### F4 - BMP Amendment Request Report (Fall Requested)

Page 2 of 6 BMP Amendment Request Report Run Time: 10:04:55 AM

#### **DS - Bureau of Development Services**

**DP Type** 

Contingency

Run Date: 9/4/20

Request Name: 10910 -General Fund Reduction

#### **Package Description**

This decision package reduces General Fund Transfer to the BDS Neighborhood Inspections Program by \$30,000. The reduction brings BDS General Fund revenue in line with the FY 2020-21 Adopted Budget 5.6% General Fund reduction Citywide.

#### Service Impacts

Reducing General Fund revenue to the Neighborhood Inspections Program will result in less funds available for nuisance abatement activity. Nuisance abatements are often completed in non-affluent neighborhoods where responsible parties are unable or unwilling to maintain their properties in compliance with the City's minimum nuisance standards. If left unabated, these health/sanitation violations will remain, impacting other properties and general neighborhood livability.

#### **Equity Impacts**

The work conducted by the Neighborhood inspections involves buildings and housing units in disrepair, which often disproportionately affect low income communities and communities of color due to affordability issues and a historic lack of access to resources.

	2020-21 FALL Requested Adj
Contingency	-30,000
	2020-21 FALL Requested Adj
Fund Transfers - Revenue	-30,000

#### F4 - BMP Amendment Request Report (Fall Requested)

Page 3 of 6 BMP Amendment Request Report Run Time: 10:04:55 AM

#### **DS - Bureau of Development Services**

**DP Type** 

Contingency

Run Date: 9/4/20

Request Name: 10911 - Elimination of Vacant Positions

#### **Package Description**

This decision package reduces the BDS personnel budget through the elimination of 53.0 FTE vacant positions. Due to impact of COVID-19 on the overall economy and development activity in Portland, BDS does not expect to need these positions for the foreseeable future.

#### **Service Impacts**

None

#### **Equity Impacts**

2020-21 FALL Requested Adj
5,744,627
-5,744,627

#### F4 - BMP Amendment Request Report (Fall Requested)

Page 4 of 6 BMP Amendment Request Report Run Time: 10:04:55 AM

#### **DS - Bureau of Development Services**

**DP Type** 

Contingency

Run Date: 9/4/20

Request Name: 10926 -Adjustment to IA with Facilities

#### **Package Description**

This is a reduction of \$88,897 to the interagency agreement with Facilities for BDS due to a reduction in the FY 2020-21 Downtown Office Space Blended Rate resulting from a decrease in debt service payments.

#### **Service Impacts**

None

#### **Equity Impacts**

Requested Adj
88,897
-88,897

#### F4 - BMP Amendment Request Report (Fall Requested)

Page 5 of 6 BMP Amendment Request Report Run Time: 10:04:55 AM

**DS - Bureau of Development Services** 

**DP Type** 

Contingency

Run Date: 9/4/20

Request Name: 11020 -Adjustment to IA with BPS for BSA

#### **Package Description**

This is an adjustment of \$18,000 to the interagency agreement with BPS for services provided by a Business Systems Analyst to the BDS Technology Support Team.

#### **Service Impacts**

None

#### **Equity Impacts**

ALL Requested Adj
-18,000
18,000

#### F4 - BMP Amendment Request Report (Fall Requested)

Page 6 of 6 BMP Amendment Request Report Run Time: 10:04:55 AM

**DS - Bureau of Development Services** 

**DP Type** Contingency

Run Date: 9/4/20

Request Name: 11021 -Adjustment to Portland Clean Energy Fund IA with BPS

#### **Package Description**

This is an adjustment of \$17,000 to the interagency agreement with BPS for work related to the Portland Clean Energy Fund, carrying forward a portion of the FY 2019-20 interagency amount to FY 2020-21.

#### **Service Impacts**

None

#### **Equity Impacts**

	2020-21 FALL Requested Adj
Contingency	17,000
	2020-21 FALL Requested Adj

#### **Prior Year Fund Reconciliation Report**

**Bureau of Development Services** 

#### 203 - Development Services Fund

EXPENDITURES	2019-20 Revised Budget	2019-20 Actuals	Percent of Actuals to Revised	
Personnel	57,426,597	51,526,199	89.73%	
External Materials and Services	6,639,476	5,048,671	76.04%	
Internal Materials and Services	12,353,986	11,510,185	93.17%	
Capital Outlay	2,400,000	2,074,517	86.44%	
Debt Service	1,443,126	1,443,126	100%	
Contingency	53,570,744	0	0%	
Fund Transfers - Expense	2,536,838	2,536,838	100%	
TOTAL EXPENDITURES	136,370,767	74,139,536	54.37%	

REVENUES	2019-20 Revised Budget	2019-20 Actuals	Percent of Actuals to Revised
Licenses & Permits	35,848,891	41,473,467	115.69%
Charges for Services	13,326,191	17,003,434	127.59%
Miscellaneous	4,216,041	5,131,645	121.72%
Fund Transfers - Revenue	1,100,775	1,100,775	100%
Interagency Revenue	1,263,434	1,101,347	87.17%
Beginning Fund Balance	80,615,435	0	0%
TOTAL REVENUES	136,370,767	65,810,668	48.26%

#### **Expenditure Discussion**

The bureau underspent its personnel budget primarily due to vacancies and a bureau wide hiring freeze. Citywide furloughs put in place after COVID-19 also reduced personnel expenditures in FY 2019-20. External materials and services expenditures were lower than projected broadly across many major object categories, in part due to cost savings measures implemented as a result of COVID-19. Additionally, costs related to POPS development during the fiscal year were lower than budgeted for both capital outlay and external materials and services.

#### **Revenue Discussion**

In FY 2019-20, major fee revenue categories were higher than projected due to higher than expected demand for services prior to the COVID-19 emergency declaration in March 2020. In particular, the bureau received of several extremely large project submittals resulting in significant revenue. BDS did experience a decline in demand for services after the emergency declaration; however, the strength of revenue collections prior to the pandemic was enough to keep the bureau's FY 2019-20 revenue higher than original expectations overall. Interagency revenues were lower than projected due primarily to actual nuisance abatement activity being lower than expected during the fiscal year.

### **Prior Year Fund Reconciliation Report**

**Bureau of Development Services** 

#### 217 - Grants Fund

EXPENDITURES	2019-20 Revised Budget	2019-20 Actuals	Percent of Actuals to Revised	
Personnel	20,000	17,489	87.44%	
External Materials and Services	792,525	0	0%	
Internal Materials and Services	1,000	0	0%	
TOTAL EXPENDITURES	813,525	17,489	2.15%	

REVENUES	2019-20 Revised Budget	2019-20 Actuals	Percent of Actuals to Revised	
Intergovernmental	813,525	17,489	2.15%	
TOTAL REVENUES	813,525	17,489	2.15%	

### **Expenditure Discussion**

Actual expenditures are related to BDS personnel time spent on grant funded PBOT projects.

#### **Revenue Discussion**

The budgeted funds are related to FEMA reimbursement for emergency-related expenses.

#### **Bureau of Development Services**

CIP Program Name	2019-20 Adopted Budget	2019-20 Revised Budget	2019-20 Actuals	PY Variance	PY Percent of Actuals to Revised	2020-21 Adopted Budget	2020-21 FALL Requested Total	2020-21 July Actuals	Fall Req. to Adopted Variance	Fall Req. to Adopted % Variance
Special Projects	5,102,648	5,102,648	4,484,036	-618,612	87.88%	C	0	113,793.6	0	#DIV/0
Sum:	5,102,648	5,102,648	4,484,036	-618,612	-12.12%	0	0		0	#DIV/0

#### **Prior Year Variance Description**

The Portland Online Permitting System ended fiscal year 2019-2020 below budgeted amounts while successfully launching the remaining project components: DevHub PDX on July 1, 2019, AMANDA 7 and Inspection Scheduling together in February 2020, and the pilot of the Inspector App in late June 2020. The online / remote functionality supported by the POPS Program components have been instrumental in the bureau's response to the COVID-19 emergency.

#### **Current Year Variance Description**

Work on the Portland Online Permitting System continues in FY 2020-21 as functionality is expanded for AMANDA, DevHub PDX, and PDX ePlans, providing additional online services in areas which were previously only available in-person at the Development Services Center. BDS will reallocate the project budget to Capital Projects in the FY 2020-21 Spring Supplemental Budget Monitoring Process, once capital expenditures are more well known.

#### **Bureau of Development Services**

CIP Program Name	Project	2019-20 Adopted Budget	2019-20 Revised Budget	2019-20 Actuals	PY Variance	PY Percent of Actuals to Revised	2020-21 Adopted Budget	2020-21 FALL Requested Total	2020-21 July Actuals
Special Projects	S00043	5,102,648	4,652,648	3,431,285	-1,221,363	73.75%	0	0	83,637.91
Special Projects	S00044	0	200,000	480,642	280,642	240.32%	0	0	18,572.97
Special Projects	S00045	0	75,000	89,203	14,203	118.94%	0	0	0
Special Projects	S00046	0	25,000	86,407	61,407	345.63%	0	0	0
Special Projects	S00051	0	150,000	395,847	245,847	263.9%	0	0	11,582.72
Special Projects	S00056	0	0	652	652		0	0	0
	Sum:	5,102,648	5,102,648	4,484,036	-618,612	-12.12%	0	0	113,793.6

#### **Prior Year Variance Description**

The Portland Online Permitting System ended fiscal year 2019-2020 below budgeted amounts while successfully launching the remaining project components: DevHub PDX o

#### **Current Year Variance Description**

Work on the Portland Online Permitting System continues in FY 2020-21 as functionality is expanded for AMANDA, DevHub PDX, and PDX ePlans, providing additional online

Fall Req. to Adopted Variance	Fall Req. to Adopted % Variance
0	#DIV/0

Responsible Bureau	CIP Program Name	Project	2019-20 Adopted Budget	2019-20 Revised Budget	2019-20 Actuals	PY Variance	PY Percent of Actuals to Revised	2020-21 Adopted Budget	R
DS	Special Projects	S00043	5,102,648	4,652,648	3,431,285	-1,221,363	73.75%	0	
DS	Special Projects	S00044	0	200,000	480,642	280,642	240.32%	0	
DS	Special Projects	S00045	0	75,000	89,203	14,203	118.94%	0	
DS	Special Projects	S00046	0	25,000	86,407	61,407	345.63%	0	
DS	Special Projects	S00051	0	150,000	395,847	245,847	263.9%	0	
DS	Special Projects	S00056	0	0	652	652		0	
		Sum:	5,102,648	5,102,648	4,484,036	-618,612	-12.12%	0	

2020-21 FALL equested Total	2020-21 July Actuals	Fall Req. to Adopted Variance	Fall Req. to Adopted % Variance
0	83,637.91	0	#DIV/0
0	18,572.97	0	#DIV/0
0	0	0	#DIV/0
0	0	0	#DIV/0
0	11,582.72	0	#DIV/0
0	0	0	#DIV/0
0	113,793.6	0	#DIV/0

#### **Bureau of Development Services**

Prior Year Performance Reporting

Run Date: 9/1/20 Run Time: 5:47:22 PM

#### **Bureau Performance Narrative**

DS 0002 Number of commercial inspections per day, per inspector

In FY 2019-20 the year-end actual of number of commercial inspections per day, per inspector was 11.80. The COVID-19 pandemic has impacted the number of inspections per day as OSHA restrictions were put in place—requiring more time and less inspectors per job site. In addition, mandatory furloughs affected staffing levels in May and June of FY 2019-20. The bureau is also experiencing a decline in demand for services impacting the number of inspections performed.

DS 0009 Number of residential inspections per day, per inspector

In FY 2019-20 the number of residential inspections per day, per inspector was 21.48. The COVID-19 pandemic has greatly impacted the number of inspections per day as restrictions were put in place prohibiting inspections in occupied residences. Mandatory furloughs affected staffing levels in May and June of FY 2019-20. The bureau is also experiencing a decline in demand for services impacting the number of inspections performed. In addition, the initial closure of the permit center impacted the numbers of issued permits requiring inspection. BDS is establishing the use of photos and phones for video inspections in occupied residences.

DS\_0018 Number of housing units brought up to code because of Neighborhood Inspection Division efforts

The FY 2019-20 the year-end actual of 1,460 number of housing units brought up to code was less than prior years due to the COVID-19 pandemic. The crisis created delays in both case entry processing and the ability to perform inspections, thus resulting in reduced activity for the final quarter of FY 2019-20. In addition, mandatory furloughs affected staffing levels in May and June of FY 2019-20. Also, the dependency on complaints received creates difficulty in predicting targets year to year.

DS\_0028 Percentage of pre-issuance checks completed within two working days of last review approval

The FY 2019-20 year-end actual of 45% was less than the strategic target of 75% due in large part to the closure of the Development Service Center in March 2020. The multifaceted impact of COVID-19 led BDS change the way it conducts business while maintaining safe working conditions and physical distancing standards. In addition, Mandatory furloughs affected staffing levels in May and June of FY 2019-20. BDS expects pre-issuance turnaround times to improve due to new processes being implemented over the COVID-19 pandemic.

DS 0034 Percent residential plans reviewed by all bureaus within scheduled end dates

The FY 2019-20 year-end actual of 72% residential plans reviewed by all bureaus within scheduled end dates was less than the strategic target of 85%. One important factor is that this performance measure is constrained by all other bureaus involved in permit plan reviews. COVID-19 impacted review timelines as staff were adjusting to new tools, changing processes, and the efficiency of working from home. In addition, mandatory furloughs affected staffing levels in May and June of FY 2019-20. BDS is working to make sure staff have the resources they need to work efficiently from home and establishing new processes that allow work to be completed remotely.

DS 0035 Percentage of commercial plans reviewed by all bureaus within scheduled end dates

The FY 2019-20 year-end actual of 50% commercial plans reviewed by all bureaus within scheduled end dates was less than the strategic target of 75%. One important factor is that this performance measure is constrained by all other bureaus involved in permit plan reviews. COVID-19 impacted review timelines as staff were adjusting to new tools, changing processes, and the efficiency of working from home. In addition, mandatory furloughs affected staffing levels in May and June of FY 2019-20. BDS is working to make sure staff have the resources they need to work efficiently from home and establishing new processes that allow work to be completed remotely.

DS\_0050 Percentage of commercial permit (new construction) first review done within 20 days of application intake

The FY 2019-20 year-end actual of 68% was lower than the strategic target of 90%. The COVID-19 pandemic has greatly impacted the permit application review process while staff transitioned to telework, and processes were updated to function in a remote work environment. Mandatory furloughs affected staffing levels in May and June of FY 2019-20. In addition, closure of the Development Services Center impacted the timeliness of permit submittals and plans being provided to review staff. BDS is taking actions to adapt intake processes for customers and staff and continues to monitor reviews weekly for timeliness.

DS 0051 Percentage of Type II Land Use Reviews – application completeness review done within 14 days of application intake

The FY 2019-20 Year-end Actual of 73% was less than the strategic target of 90%. The COVID-19 pandemic has greatly impacted the permit application review process while staff transitioned to telework, and processes were updated to function in a remote work environment. Mandatory furloughs affected staffing levels in May and June of FY 2019-20. In addition, closure of the Development Services Center impacted the timeliness of permit submittals and plans being provided to review staff. BDS is taking actions to adapt intake processes for customers and staff and continues to monitor reviews weekly for timeliness.

Key Performance Measures	Measure Type Name	FY 2017-18 Actuals	FY 2018-19 Actuals	FY 2019-20 Target	FY 2019-20 Actuals	FY 2020-21 Target	Strategic Target	Details	
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#### **Bureau of Development Services**

Prior Year Performance Reporting

Run Date: 9/1/20 Run Time: 5:47:22 PM

DS_0002	Number of commercial inspections per day, per inspector	EFFICIENCY	13.70	11.80	12.00	11.80	11.00	11.00	
DS_0009	Number of residential inspections per day, per inspector	EFFICIENCY	26.46	24.40	25.00	21.48	20.00	20.00	
DS_0018	Number of housing units brought up to code as a result of Neighborhood Inspection Division efforts (includes enhanced inspection pilot beginning in FY 2010-11)	OUTPUT	1,604	1,962	2,360	1,460	1,250	1,250	
DS_0028	Percentage of pre-issuance checks completed within two working days of last review approval	EFFICIENCY	70%	60%	72%	45%	50%	75%	
DS_0034	Percentage of residential plans reviewed by all bureaus within scheduled end dates	EFFICIENCY	68%	66%	65%	72%	55%	85%	
DS_0035	Percentage of commercial plans reviewed by all bureaus within scheduled end dates	EFFICIENCY	60%	61%	65%	50%	65%	75%	
DS_0050	Percentage of Commercial Permit (New Construction) First Review done within 20 days of application intake	EFFICIENCY	77%	92%	70%	68%	70%	90%	
DS_0051	Percentage of Type II Land Use Reviews - Application Completeness Review done within 14 days of application intake	EFFICIENCY	50%	81%	65%	73%	70%	90%	
	Other Performance Measures	Measure Type Name	FY 2017-18 Actuals	FY 2018-19 Actuals	FY 2019-20 Target	FY 2019-20 Actuals	FY 2020-21 Target	Strategic Target	Details
DS_0001	Number of Commercial Inspections	WORKLOAD	65,892	68,120	60,000	61,233	49,000	49,000	
DS_0003	Percentage of commercial inspections made within 24 hours of request	EFFICIENCY	87%	92%	92%	94%	92%	95%	
DS_0004	Number of enforcement cases prepared and presented to Code Hearings Officer (All case types: Zoning, EDPEP, Housing, Nuisance)	WORKLOAD	2	7	2	6	5	2	
DS_0005	Number of zoning code violation statistics (cases, inspections, and letters)	WORKLOAD	5,121	4,169	4,348	3,166	2,530	2,530	
DS_0006	Number of home occupation permits issued	WORKLOAD	112	111	110	120	76	76	

Prior Year Performance Reporting

Run Date: 9/1/20 Run Time: 5:47:22 PM

		Other Performance Measures	Measure Type Name	FY 2017-18 Actuals	FY 2018-19 Actuals	FY 2019-20 Target	FY 2019-20 Actuals	FY 2020-21 Target	Strategic Target	Details	
-	DS_0007	Number of properties assessed code enforcement fees	WORKLOAD	270	302	290	167	150	150		
[	DS_0008	Number of Residential Inspections	WORKLOAD	125,254	118,278	92,000	101,076	80,800	80,800		
I	DS_0011	Number of inspection trips reduced due to multi-certified inspectors	EFFICIENCY	19,196	17,885	18,000	14,877	14,500	14,500		
I	OS_0012	Number of Land Use Review and Final Plat Applications	WORKLOAD	775	643	610	571	450	450		
[	DS_0016	Number of nuisance inspections	WORKLOAD	7,845	7,368	8,600	5,651	5,000	5,000		
ſ	OS_0017	Number of housing and derelict buildings inspections	WORKLOAD	4,459	4,970	5,050	3,270	2,850	2,850		
I	DS_0019	Number of properties cleaned up	OUTPUT	2,426	2,130	2,600	1,799	1,580	1,580		
[	DS_0020	Number of issued commercial building permits	WORKLOAD	3,363	3,284	3,100	2,498	1,990	1,990		
ſ	DS_0021	Number of issued residential building permits	WORKLOAD	6,832	5,764	5,900	4,346	3,500	3,500		
ſ	DS_0022	Total number of issued commercial and residential building permits	WORKLOAD	10,195	9,048	9,000	6,844	5,490	5,490		
I	DS_0023	Number of electrical permits	WORKLOAD	19,066	16,363	15,800	14,007	11,200	11,200		
I	DS_0024	Number of mechanical permits	WORKLOAD	11,913	11,513	11,700	9,469	7,580	7,580		
I	DS_0025	Number of plumbing permits	WORKLOAD	11,123	10,634	10,400	9,313	7,450	7,450		
I	DS_0026	Number of sign permits	WORKLOAD	835	760	780	502	400	400		
I	OS_0027	Percentage of building permits issued over the counter the same day as intake	EFFICIENCY	52%	48%	55%	45%	35%	35%		

#### **Bureau of Development Services**

Prior Year Performance Reporting

Run Date: 9/1/20 Run Time: 5:47:22 PM

	Other Performance Measures	Measure Type Name	FY 2017-18 Actuals	FY 2018-19 Actuals	FY 2019-20 Target	FY 2019-20 Actuals	FY 2020-21 Target	Strategic Target	Details
DS_0031	Number of site development plan reviews	WORKLOAD	4,339	4,149	4,000	3,715	2,950	2,950	
DS_0032	Average number of working days to first review	EFFICIENCY	11.21	8.32	7.00	11.28	9.00	7.00	
DS_0040	Number of housing intakes	WORKLOAD	2,105	1,875	2,116	1,413	1,200	1,200	
DS_0041	Number of nuisance intakes	WORKLOAD	4,275	3,323	4,232	2,755	2,350	2,350	
DS_0042	Number of code enforcement fee waiver requests	WORKLOAD	360	296	324	296	255	255	
DS_0043	Number of code enforcement fee waivers granted	OUTCOME	343	282	240	247	235	235	
DS_0044	Number of housing units inspected (includes enhanced inspection pilot beginning in FY 2010-11)	WORKLOAD	3,596	3,818	2,016	2,513	2,010	2,010	
DS_0045	Number of site development permit inspections	WORKLOAD	426	476	460	304	240	240	
DS_0046	Number of site development land use case reviews	WORKLOAD	939	801	900	721	575	575	
DS_0047	Number of sanitation permits and evaluations issued	WORKLOAD	523	449	500	393	315	315	
DS_0048	Number of construction code violation cases	WORKLOAD	276	214	150	264	210	210	