
Case Management Structure Policy and Procedures

1.1 PURPOSE AND SCOPE

The purpose of this policy is to promote accountability, consistency in case work, cross training, distribution of the workload, and provide diversity in assignments. Code Enforcement will be practicing a rotating compartmentalization approach of case management. Each Code Enforcement Officer will train in each role within the case management structure. Code Enforcement cases will be comprised of contributions from multiple Code Enforcement Officers. Once proficient in each role, Code Enforcement Officers will rotate roles for the following reasons:

- (1) Aptitude for a specific role(s)
- (2) Time-based rotation
- (3) As needed by the Division or Department.

All requests made by staff requesting placement into a specific role will be considered by the Division Manager. The role descriptions are detailed on the following pages but are subject to change as the Division gains knowledge and experience within this structure and as Division resources needs and workload change.

1.2 BACKGROUND

The Code Enforcement Division historically operated with only two to three Code Enforcement Officers for the entire County. Additionally, the Code Enforcement Division became formalized in 2017, where it began to develop key processes to carry out investigations and enforcement methods. During this time, each Code Enforcement Officer was assigned to address each case on their case load from start to finish, including all enforcement actions. As the Division's processes were developed and work volume grew, so was the need to ensure consistency and efficiency for all efforts made by the Division to ensure fairness and equity for the public it serves. As a solution, the Division opted to formalize a case management structure that provides requirements for each step of the investigative and enforcement process and ensure accountability for each officer.

1.3 ROLE TITLE AND PROCEDURES

INTAKE

Intake is the initial contact point for all community interactions, complaints, departmental referrals, and directed enforcement actions. Complaints, referrals, and directed enforcement locations will be logged into TRAKiT, which will begin the Code Enforcement process.

The entries will be assigned a TRAKiT CodeTRAK designation based on the nature of the complaint (e.g., IC_2026-0000). A restriction will be placed on the parcel via LandTRAK indicating a Code Enforcement investigation has been initiated. Any information tracking or spreadsheet population regarding the number and type of entries will be entered.

Intake Role and Key Objectives:

Role Description: The *Intake* role can be filled by either administrative staff or a Code Enforcement Officer. It is of utmost importance to be courteous but firm when dealing with the public and other Departments or Agencies. Additionally, obtaining as much information as possible at the onset is needed in order to build the strongest possible foundation. The information that is entered, and how it is entered, must be consistent and accurate.

Advancing the Entry: Once a restriction has been placed, the entry has been logged into TRAKiT (along with any available supporting information), assigned a designation and the information tracking is complete, the entry can be moved to the officer assigned to the corresponding geographic sector (North or South), for *Pre-Investigation*.

Deliverables: Complaints received. Complaints Logged (entries created) and forwarded. Returns.

PRE-INVESTIGATION

During this stage of the Code Enforcement process, the entries will be examined for specific qualifications and corresponding actions taken. Based on the nature of the situation, a determination will be made whether the entry is within Code Enforcement's jurisdiction. One aspect of the entry, or the entire entry, may need to be referred to another Division, Department, or Jurisdictional Authority. If the entry is duplicative of an active investigation, the complainant information will be transferred to the active investigation, and the duplicative entry closed with an explanation recorded using TRAKiT's Chronology Notes. If the entry is not within Code Enforcement's jurisdiction, not as reported, or referred in its entirety, and the entry closed, then the complainant will be contacted, and a detailed chronology note will be added.

TRAKiT will be loaded with relevant case information including (but not limited to):

- (1) Recorded Deeds, including the most current property owner information
- (2) Secretary of State registration for LLCs, including the Agent for Service of Process
- (3) Recent aerial imagery
- (4) Parcel map
- (5) Overlapping jurisdiction information (e.g., Coastal Zone)
- (6) Any other information that would help establish ownership and physical data related to the site (e.g., real estate listings, online advertisements, etc.)

Pre-Investigation Role and Key Objectives:

Role Description: The *Pre-Investigation* role will be filled by journey level Code Enforcement Officers with broad knowledge of jurisdictional responsibility, physical knowledge of the County, experience with Planning and Building Division functions, and technical skills related to information research. *Pre-investigation* sets the foundation for the next step, and by vetting the entries, the process creates efficiency.

Accountability Measure: The Pre-Investigator must review all submissions from Intake for completeness and accuracy. Once the review is complete, all responsibility for the entry is assumed by Pre-Investigation. If corrections or additional information is required, then the entry shall be moved back to *Intake* with a clear written request to Intake and copied to the direct Supervisor.

Advancing the Entry: Once the entry has been examined for Code Enforcement jurisdiction, relevant referrals made, additional complainant information transferred to an active investigation, and research information loaded, the entry can then be moved to the investigating officer assigned to the corresponding geographic sector, North or South, for *Investigation*.

Deliverables: Entries received. Referrals. Entries forwarded by designation. Returns.

INVESTIGATION

The first step in *Investigation* is the prioritization of the investigating officer's case load to establish in which order entries will be engaged. Priorities are established by the Board of Supervisors and the Director of the Department. Each investigating officer will discuss how best to implement their priorities with their direct Supervisor. With priorities established and direction provided, the next step in an individual entry is for the investigator to collect any additional information required to determine what the potential violation is (and what it is not), and the likelihood that a violation exists. The investigating officer will contact the complainant (if known) to gather specific information and to provide an update. This is a key step in community outreach. This also allows for the investigating officer to have a better understanding of the complainant's concerns and offers an opportunity for the investigator to explain what Code Enforcement can do to address the complaint (as well as what may not be addressed based on the type of concern).

Next, the investigating officer will establish contact between Code Enforcement, the Property Owner and/or the Responsible Party (note that these last two could be one and the same). Investigating officers must make every effort to make contact using all means at their disposal, including but not limited to:

- (1) phone calls
- (2) direct mailing
- (3) in-person contact
- (4) posting requests for contact.

It is imperative that every attempt is documented in TRAKiT chronologies.

During the course of investigation, evidence will be collected and examined. In cases where the nature of the violation exceeds the general knowledge or experience of the investigating officer, a Determination Request will be submitted to the Planning and/or Building Division for an official assessment by subject matter experts. Grading and Best Management Practice implementation determinations are made by the Code Enforcement Division with support from the Building Official using a *Grading Determination Worksheet*.

Throughout the ensuing communication, the Property Owner will be informed of any violation(s) and provided with an opportunity to come into compliance. The investigating officer will communicate (in detail) what actions need to be taken to achieve compliance. Code Enforcement must ensure all permits are obtained (when required) for appropriate County cost recovery, and fair application of the law, regardless of how "big or small" the structure or impact is.

Once violation(s) are confirmed by the investigating officer, the investigating officer will update the LandTRAK restriction using the Department's most current *Violation Fee Procedure*. The investigating officer has the discretion to provide the property owner with a courtesy *Inspection Report*. The purpose of the Inspection Report is to catalog the observed violation(s) and the corresponding corrective actions required to achieve compliance. This report will be scanned into TRAKiT to memorialize the investigative results. Additionally, the report will provide clear instructions to the property owner on what specific violations exist and what corrective actions need to be taken to correct them. Completed Inspection Reports will be retained electronically for potential use by Code Enforcement Officers in the *Enforcement* role if further enforcement actions are taken by the Division.

Assisting responsible parties in achieving compliance may require multiple communications to "walk them through" the process within a reasonable amount of time. The primary purpose of the officer assigned to investigation is compliance. In the case of active construction, a Stop Work Notice shall be issued per the Department's most current *Stop Work Order (SWO) Procedure*. Additionally, whenever a SWO is issued and there is evidence that work is being done by a licensed or unlicensed contractor, the name(s) and contact information of the party performing the work will be obtained and a *Contractor State License Board (CSLB) Building Department Referral Form* shall be completed and sent to the CSLB with all known information noted in the referral. A copy of any referral made to CSLB will be retained by the Department and attached to the case in TRAKiT.

If the Property Owner achieves compliance at the location in question, the investigating officer will thoroughly document the investigation, remove the LandTRAK restriction, and close the case after contacting the complainant. If all required permits are in the application stage but have not yet been issued (i.e., permit applications have been submitted to the Planning and Building Department and are still under review), the investigating officer can refer the entry to *Remediation* for monitoring.

If the Property Owner(s) are non-responsive, or permissions for site inspections are not granted, the investigating officer will make every effort to obtain evidence that a violation exists and report accordingly. It is the responsibility of the investigating officer to demonstrate through evidence and precise documentation the need for formal enforcement action. A presentation of the case will be reviewed by the investigating officer's direct Supervisor to ensure that the criteria and standards are met.

Investigation Role and Key Objectives:

Role Description: The *Investigation* role will be filled by both journey-level Code Enforcement Officers and entry-level Code Enforcement Officers with oversight of journey-level Officers and Code Enforcement Supervisors. Key skills will be: problem solving, tact, time-management, and a proclivity for positive but firm community interaction.

Accountability Measure: The Investigator must review all submissions by *Pre-Investigation* for completeness and accuracy. Once the review is complete, all responsibility for the entry is assumed by *Investigation*. If corrections or additional information are required, then the entry shall be moved back to *Pre-Investigation* with a clear written request to *Pre-Investigation* and copied to the direct supervisor.

Advancing the Entry: Once priorities have been exercised, violations identified, LandTRAK restriction updated, the complainant contacted, communication established with the Property Owner and Responsible Party, the violations successfully explained, an opportunity to comply given (with reasonable time frames established by the investigating officer), refusal to comply acknowledged, accurate documentation cataloged, case criteria and standards met, and all pathways to compliance exhausted, the entry can be submitted to *Enforcement*.

Deliverables: Entries received. Complainants successfully contacted. Responsible Parties successfully contacted. Determination requests. Inspection Reports. Entries closed with compliance. Entries forwarded to *Remediation* or *Enforcement*. Returns.

ENFORCEMENT

When entries arrive at the *Enforcement* portion of the case management process, a physical file will be created for evidence retention (e.g., certified mail receipts, wet signature documents, etc.). Any complaints or referrals will be converted to "cases" in TRAKiT with the corresponding CodeTRAK designation (e.g., BI/BC/ZI/ZC_2026-0000). The order in which Enforcement cases are engaged will be prioritized in the same way as *Investigation* cases.

The Property Owner(s) should be contacted for an additional opportunity to comply and be informed that Code Enforcement will take formal enforcement action at this time. If the Property Owner makes an effort to comply, and there are no Life or Safety concerns, Code Enforcement shall continue to communicate the corrective actions required and work with them within a reasonable timeframe. *Enforcement's* primary purpose is compliance.

If the Property Owner achieves compliance at the location in question, the officer overseeing enforcement will thoroughly document any communication and/or formal enforcement actions, remove the LandTRAK restriction, and close the case after contacting the complainant. If the required permits are in the application stage but have not yet been issued, the officer overseeing enforcement can refer the entry to *Remediation* for monitoring.

If no resolution is reached, formal enforcement actions shall commence, with each document being developed based on the specific violation and the specific site and then reviewed by the direct Supervisor. Formal enforcement shall include but is not limited to:

- (1) Notice of Violation(s) (NOV)
- (2) Administrative Citations (AC)
- (3) Recordation of Notice of Violation(s) against the subject property

Recordation of Notice of Violation(s) are commonly referred to as a "Lien", although no monetary value is attached. Filing a lien against a property with the Recorder's Office is intended to both leverage compliance and notify potential buyers that violations exist on the property. All formal actions must comply with Division and Department Policies and Procedures. Special care MUST be applied to how documents are served to Property Owners and Responsible Parties to conform to the Mendocino County Code and State Law.

Enforcement Role and Key Objectives:

Role Description: The *Enforcement* role will be filled by journey-level Code Enforcement Officers. Due to the highly technical nature of the *Enforcement* role, accuracy, attention to detail, subject matter knowledge, and critical thinking skills are required. This role must strictly adhere to all Division, Department, and County policies and procedures, particularly with regard to service requirements.

Accountability Measure: *Enforcement* must review all submissions by *Investigation* for completeness and accuracy. Once the review is complete, all responsibility for the entry is assumed by *Enforcement*. If corrections or additional information is required, then the entry shall be moved back to *Investigation* with a clear written request to *Investigation* and copied to the direct Supervisor.

Advancing the Case: Once the case has been created, outreach communication deemed ineffective, all formal actions properly executed, proper service achieved, the TRAKiT case properly documented and updated, and reviewed by a direct Supervisor, the case can be submitted to the Supervisor for *Multi-departmental Enforcement (MDE)*.

Deliverables: Entries received. Cases created. Actions taken by type. Cases closed with compliance. Cases forwarded to *Remediation* or *MDE*. Returns.

REMEDIATION

The function of *Remediation* is to track entries or cases with a clearly defined strategy for compliance. This strategy will have been established by the previous role. These locations typically will have submitted building permit applications under review. Additionally, there should not be further formal enforcement actions suggested at the time they are submitted to *Remediation* - rather a need to monitor and encourage compliance as fast as reasonably possible, NOT based on the building permit default timeline. The *Remediation* person will assess received individual case statuses that are pending potential closure by monitoring for issued/final permits (e.g., building, use, CDP, etc.) or need for final inspections to show the site is in compliance.

Should a permit expire, a correction letter goes unanswered, or a timeline (as set by Code Enforcement, Building, or Planning Department) not be met, *Remediation* shall engage the Property Owner or Responsible Party to ensure that every effort is being applied to achieve compliance. As a general practice, it is NOT necessary for Code Enforcement to wait for a permit to expire prior to engagement. The timeline for compliance will be established by *Investigation* or *Enforcement* based on the specific circumstances of each location, typically much shorter than the time allotted for completion of a building permit. Information and follow-up communication shall be provided and documented in TRAKIT chronology.

If an entry or case has a clearly defined strategy for compliance but did not require any additional building permits or any additional formal action, the officer overseeing *Remediation* shall contact the Property Owner and perform follow-up inspections based on an appropriate timeline and/or compliance strategy.

If the Property Owner achieves compliance at the location in question, the officer overseeing *Remediation* will thoroughly document any communication and/or additional actions, remove the LandTRAK restriction, and close the case after contacting the complainant.

When a Release of Lien request is submitted for a property which has a lien recorded by Code Enforcement, the officer overseeing remediation shall provide all the information and corrective actions required. Additionally, if a compliance inspection is requested and completed with a determination that compliance was achieved, a Release of Lien shall be completed (to include collection of payment for the Recorder's Office to remove the lien).

Remediation Role and Key Objectives:

Role Description: The *Remediation* role will be filled by both journey-level Code Enforcement Officers and entry-level Code Enforcement Officers with oversight of journey-level Officers and Code Enforcement Supervisors. Key skills will be problem solving, tact, time-management, and a proclivity for positive but firm community interaction.

Accountability Measure: *Remediation* must review all submissions by *Enforcement* and *Investigation* for completeness and accuracy. Once the review is complete, all responsibility for the entry is assumed by *Remediation*. If corrections or additional information is required, then the entry shall be moved back to *Enforcement* or *Investigation* with a clear written request to *Enforcement* or *Investigation* and copied to the Direct Supervisor.

Advancing the Case: If the Property Owner does not perform and compliance is not achieved, the case shall be brought to the direct Supervisor for consideration and possible reassignment to *Enforcement*.

Deliverables: Cases received. Cases closed with compliance. Cases forwarded. Returns.

MULTI-DEPARTMENTAL ENFORCEMENT

The *Multi-Departmental Enforcement (MDE)* role will typically rely on coordination with other Divisions, Departments, and Jurisdictions. After a thorough review of the cases submitted by *Enforcement*, *MDE* shall determine what the best elevated enforcement course of action should be. This may take many forms, including, but not limited to:

- (1) Creating and submitting an inspection warrant to a Judge and coordinating the corresponding action at the property location

- (2) Preparing a lawsuit for review by County Counsel to seek an injunctive order against a Property Owner to stop or remediate a violation
- (3) Facilitating summary and administrative abatement orders and actions
- (4) Facilitating settlement negotiations between the Division, the Department, County Counsel, and the responsible party
- (5) Monitoring compliance plans and settlement agreements for benchmarks and timelines
- (6) Processing appeals submitted to the Division and coordinating the subsequent hearings
- (7) Collection of penalties

MDE Role and Key Objectives:

Role Description: The *MDE* role will be filled by experienced Code Enforcement Officers who demonstrate an aptitude for both attention to detail and the ability to present information in a variety of formal environments.

Accountability Measure: *MDE* must review all submissions by *Enforcement* for completeness and accuracy. Once the review is complete, all responsibility for the entry is assumed by *MDE*. If corrections or additional information is required, then the entry shall be moved back to *Enforcement* with a clear written request to *Enforcement* and copied to the direct Supervisor.

Deliverables: Cases received. Cases closed with compliance. Concluded actions by type and outcome. Penalties collected. The attached documents are subject to change to by the Division and the Department on an as-needed basis. When Code Enforcement Officers utilize these documents, it is imperative that they use the most recent version.
