

Integrated Waste Management Enforcement Program:

Clarifying Goals and Performance Expectations Would Improve Enforcement Coverage

> A Report from the City Auditor Issued September 2023 <u>http://www.sanjoseca.gov/auditor</u>



Background

- The IWM Enforcement team enforces Municipal Code and contractual requirements to resolve solid waste management issues.
- Typical cases include dangerous accumulation, improper set out of containers, illegal hauling, and other issues.
- The team has five positions to respond to complaints and conduct outreach with residents and businesses.

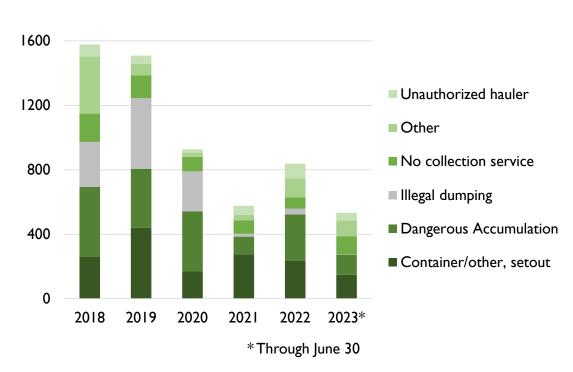
Example of Dangerous Waste Accumulation, a Common Case Type





Finding I: ESD Should Clarify the Mission and Workload Expectations of the IWM Enforcement Team

- A decline in public complaints has contributed to lower workload.
- Work in other areas has declined, including shifting enforcement of illegal dumping to Planning, Building and Code Enforcement.



Complaints and Caseload Have Changed Over Time



Finding I: ESD Should Clarify the Mission and Workload Expectations of the IWM Enforcement Team

- In the first half of 2023, each inspector was conducting about 2.3 inspections per day, which is below expectations.
- New responsibilities, such as outreach or enforcement related to new legislation or existing ordinances, have been added to the team's responsibilities.

RECOMMENDATIONS:

To focus and prioritize the team's work, ESD should:

- Clarify the mission and goals and create success metrics for the team.
- Set performance expectations for inspectors and monitor inspector performance.
- Update procedures to clarify expectations for inspector activities around illegal dumping and no service collection.



Finding 2: Proactive Cases Should Focus on Expanding Coverage Citywide

- Proactive cases largely follow the same geographic trends as solid waste complaints, resulting in a risk of underreported issues in some parts of the city.
- Updated procedures would enable the team to better reach communities that may have underreported solid waste violations, and tailor outreach materials appropriately.

RECOMMENDATIONS:

To better expand coverage citywide, ESD should:

 Update the team's proactive procedures to refocus the team's work on areas with fewer complaints, using factors such as multi-family and commercial density.



Finding 3: Streamlining Administrative Tasks Would Give Inspectors More Time in the Field

- The software platform that the team uses is outdated and was not designed for their needs, making data entry complicated and time consuming.
- Clarifying expectations for other activities can lead to efficiencies and maximize time in the field.

RECOMMENDATIONS:

To maximize the time that inspectors can spend in the field, ESD should:

- Procure a new software solution that allows for more streamlined data entry and management.
- Update procedures around identifying responsible parties.



Conclusion

This report has seven recommendations to improve the City's Integrated Waste Management (IWM) Enforcement Program's service delivery.

We would like to thank the Environmental Services Department, along with the City Attorney's Office and the City Manager's Budget Office, and staff from Planning, Building & Code Enforcement and Parks, Recreation & Neighborhood Services.

The audit report is available at <u>www.sanjoseca.gov/auditor</u>

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