



Memorandum

TO: HONORABLE MAYOR
AND CITY COUNCIL

FROM: Jon Cicirelli
Zulma Maciel

SUBJECT: Reasonable
Accommodation Process
and Personal Property
Impound Handling

DATE: February 19, 2026

Approved

Date:

2/19/26

COUNCIL DISTRICT: Citywide

RECOMMENDATION

- (a) Approve the revised Personal Property Impound Standard Operating Procedure, clarifying roles and responsibilities for the handling, storage, and return of personal property encountered in public spaces.
- (b) Delegate authority to the City Manager or her designee to administratively amend the Standard Operating Procedure in coordination with the City Attorney's Office for all future updates.

SUMMARY AND OUTCOME

This report will provide the City Council with an understanding of existing reasonable accommodation protocols related to encampment abatements and the improvements identified by the City Manager's Office of Racial and Social Equity that will be implemented. The revised actions are intended to enhance staff capacity, promote consistent application of accommodations across departments, reduce risk of noncompliance with disability access requirements, and advance the City's racial and social equity goals.

Approval of the recommended action will adopt a revised Personal Property Impound Standard Operating Procedure (SOP) applicable when City staff or contractors encounter personal belongings in public spaces while performing City services. The revised SOP clarifies roles and responsibilities for the handling, storage, and return of personal property, and updates internal procedures to reflect current operational practices and evolving legal standards. Delegating authority to the City Manager or her designee to administratively amend the SOP in coordination with the City Attorney's

Office will allow the City to respond more efficiently to future legal, operational, or resource changes without returning to City Council for routine procedural updates.

BACKGROUND

The October 28, 2025 City Council referral in response to the Coordination of Homelessness Activities Audit Report called upon the City Attorney and the City Manager to review existing protocols and training materials concerning reasonable accommodations for individuals with disabilities and the Personal Property Impound SOP. The City Attorney's Office, the City Manager's Office, and the Departments of Parks, Recreation, and Neighborhood Services (PRNS), Public Works, and Housing have since met to discuss and coordinate a response to this referral.

The City Attorney's Office, City Manager's Office, and Disability Affairs Officer in the City Manager's Office of Racial and Social Equity reviewed relevant protocols and training materials from the Housing Response Division (Housing Department), Beautify San José (BeautifySJ) within PRNS, and the Transportation Department (Oversized and Lived-In Vehicle Enforcement – OLIVE activation interactions) and had a series of meetings with departmental staff to clarify current practices. It was determined that the current reasonable accommodation process met all legal requirements; however, there are some suggested operational improvements that will be implemented. The Disability Affairs Officer will continue to conduct field observations and engage with staff and community members, refine findings as appropriate, and continue collaborating with City departments to advance equitable access.

ANALYSIS

Reasonable Accommodation Process

Background

Roughly one in four San José residents has a disability, and people with disabilities tend to be disproportionately represented among the unhoused population. A significant portion of the unhoused population includes individuals with mental health disabilities and intellectual or cognitive disabilities, including autism and other neurodivergent characteristics. Comorbidity is common, particularly among aging individuals. The City of San José is committed to ensuring that its facilities, programs, and services are accessible to all, including disabled individuals who may require reasonable accommodations as part of the abatement process.

The City Manager's Office of Racial and Social Equity acknowledges the critical contributions of advocates and frontline staff supporting unhoused individuals with disabilities, as well as the collaborative efforts of the Homelessness Response Division,

BeautifySJ, and the City's designated Americans with Disabilities Act (ADA) Coordinator, as required under the ADA, located within the Public Works Department in evaluating reasonable accommodations. Building on this work, the following section summarizes key findings and presents actions that will be implemented, in partnership with the Disability Affairs Officer, to enhance consistency, transparency, and effectiveness in the reasonable accommodations process. As noted above, it was determined that the current reasonable accommodation process met all legal requirements; however, there are some operational improvements as outlined in this memorandum.

City Manager's Office of Racial and Social Equity Review

There is an established internal process for reviewing reasonable accommodation requests related to the abatement process that is consistent with applicable laws and peer jurisdictions. Requests are received through multiple channels, including verbal requests made to BeautifySJ staff during the abatement process and information sent directly to the ADA Coordinator by community advocates on behalf of individuals. Supporting information is sometimes incomplete, such as lacking a clear connection between the reported disability and the requested accommodation. When follow-up is required, the City may be unable to reach the individual, or the individual may decline to proceed, resulting in inconsistent information and delays. The individualized assessment and documentation requirements also extend timelines. Requests are denied or discontinued when they are determined not to be reasonable or when individuals choose not to continue with the process, including in cases where housing is a condition of the accommodation. Overall, departments generally follow established procedures. However, short-term or informal accommodations granted in the field are not consistently documented in data tracking systems.

No changes to the process itself are recommended. Instead, changes that will be implemented focus on centralizing data collection and reporting to provide a more complete picture of what is actually occurring, improving communication about the reasonable accommodation process for individuals with disabilities and external stakeholders, and providing reoccurring training on the reasonable accommodation process to staff in relevant departments.

Data Collection and Reporting

Current data collection and reporting do not fully capture the scope or complexity of reasonable accommodation practices, as staff rely on decentralized tracking methods. A centralized system will be developed to log accommodation requests, decisions, timelines, and informal or short-term accommodations granted in the field, to better reflect actual practices and support transparency and accountability.

Regular debriefs occur internally after large abatements and it has been determined that the Disability Affairs Officer should always be included in these discussions to evaluate opportunities for improvement.

Outreach and Communication

While there are standardized forms, there were no additional materials for external stakeholders to explain the process for requesting reasonable accommodations as it relates to abatement, which may result in confusion about how to navigate this process.

Therefore, a simplified Frequently Asked Questions (FAQ) document explaining the reasonable accommodation process in an accessible format will be created. The Disability Affairs Officers will collaborate with relevant departments on opportunities to enhance communication and outreach by developing plain-language, multilingual materials—including a simplified FAQ explaining the reasonable accommodation process, eligibility, and common examples—and ensure these materials are available online and distributed during in-person outreach before scheduled abatements.

Training

Operations staff received comprehensive, reasonable accommodation training in June 2025 on applicable laws, the process for responding to accommodations during encampment abatements, and hypothetical scenarios. BeautifySJ is collaborating with the Disability Affairs Officer to integrate disability considerations into upcoming training on handling personal property during impound.

Based on the Disability Affairs Officer recommendations, BeautifySJ will provide onboarding and refresher training for operations staff and incorporate reasonable accommodation guidance into all relevant trainings.

Revised Personal Property Impound Standard Operating Procedure

Background

In 2019,¹ the City Council approved the revised Encampment Abatement Procedures that included direction regarding the handling and storage of personal property encountered in public spaces. At the time, encampment abatement was the Housing Department's responsibility, but it was transitioned to BeautifySJ in 2020. Since that time, the City has continued to refine its operational practices related to sanitation

¹ <https://sanjose.legistar.com/View.ashx?M=F&ID=7052789&GUID=E05BA984-6E86-4A22-B972-524582C7620C>

services, debris removal, and the impoundment of personal property located on public land in violation of the San José Municipal Code.²³⁴⁵

BeautifySJ, within the PRNS Department, is responsible for coordinating sanitation services and related activities in public spaces, including circumstances where personal property must be impounded to address health, safety, or access concerns. Over time, personal property handling guidance has been incorporated into multiple documents, including prior abatement protocols and agreements developed in connection with specific projects or interagency coordination.

The revised Personal Property Impound SOP consolidates and clarifies these practices into a single, Citywide operational document and better aligns with changes to the City's protocols as reflected in updates to the City's Good Neighbor/Code of Conduct guidelines.⁶ The revised SOP will supersede prior personal-property handling provisions that were adopted as part of earlier encampment abatement discussions or agreements, including guidance developed in connection with the City's prior coordination efforts with the Santa Clara Valley Water District.⁷

Moving forward, the Personal Property Impound SOP will be updated in coordination with the City Attorney's Office to ensure that the policy stays in alignment with current case law. Additionally, PRNS will align related Encampment Management SOPs and other external-facing documents with the revised Personal Property Impound Process.

The revised SOP (Attachment) is intended to clarify how the City handles personal property encountered in public spaces while performing City services, with an emphasis on consistency, transparency, and operational practicality. The revisions do not create new enforcement authority, but instead refine internal procedures for impoundment, storage, and return of property when required. Any additional enforcement authority or further requirements would necessitate additional funding.

Key updates include the following:

Clarification of Storage Presumptions. The SOP clarifies that when it is not immediately clear whether an item constitutes trash, hazardous material, abandoned property, or personal property, the default approach is to treat the item as personal property and

² <https://sanjose.legistar.com/View.ashx?M=F&ID=10860685&GUID=3BEB1411-FBEC-4F19-9163-CC120C6ED303>

³ <https://www.sanjoseca.gov/home/showpublisheddocument/104553/638289877961640883>

⁴ <https://sanjose.legistar.com/View.ashx?M=F&ID=9894398&GUID=91CE8F70-D6EB-49A8-9891-6E2111BB4EF0>

⁵ <https://sanjose.legistar.com/View.ashx?M=F&ID=9259171&GUID=72F4CA19-0DF0-495D-AEF8-DB98E3BC20FD>

⁶ <https://www.sanjoseca.gov/home/showpublisheddocument/117680/639034656216130000>

⁷ The administrative process for general encampment abatement will be updated separately to reflect and conform to the revised Personal Property Impound SOP.

store it. This approach aligns with practices adopted by peer jurisdictions and provides clearer direction to field staff.

Bulk Personal Property Handling. The SOP clarifies that larger personal items may not be categorically excluded from storage. Instead, bulk personal property is subject to a shorter minimum storage period. Other West Coast jurisdictions have adopted similar approaches to balance individual property interests with operational constraints. BeautifySJ will need to continue evaluating storage capacity and costs associated with bulk items.

Adjusted Storage Timeframes. The SOP reduces the minimum storage period for non-bulk personal property in recognition of the City's operational and resource constraints. BeautifySJ maintains a finite amount of storage space that is planned around the applicable minimum storage period, and the extended storage times required additional facilities, staffing, and significant additional cost. There is no fixed statutory timeframe for storage, and other jurisdictions have implemented shorter retention periods that have withstood legal scrutiny.

Expanded Guidance on Abandoned Property. The SOP provides additional guidance to assist staff in distinguishing abandoned property from personal property, including examples involving illegal dumping or items placed for refuse collection. The definition aligns with the City's Good Neighbor/Code of Conduct guidelines and reflects public health considerations as well as staff and contractor safety and resource constraints. The presumption of abandonment is rebuttable and may be overcome by facts demonstrating the property was not intentionally discarded, such as indicia of ownership or apparent value or use, or proximity to living space. These clarifications are intended to improve consistency in the field and reduce uncertainty for staff.

From an operational standpoint, staff have encountered challenges when service locations and personal living areas are not clearly defined. In some instances, multiple individuals have claimed the same item, leading to disputes and, at times, safety concerns for staff and members of the public. Establishing a defined living space of 12 x 12 x 10 feet provides a common, objective reference point for staff and individuals alike, helps distinguish personal space from public space, and supports safer and more consistent field operations.

Documentation and Accountability. The SOP reinforces documentation requirements for stored items, including photographs and video documentation of site and item conditions, and contemporaneous notes, to support transparency, accountability, and efficient property return.

Operational details, including staffing, training, storage capacity, and cost considerations, will continue to be addressed administratively by PRNS as part of implementation.

Training and Implementation. The SOP emphasizes the importance of ongoing training for City staff and contractors responsible for supporting or implementing personal property impound procedures. Training will be developed and delivered in coordination with the City Attorney's Office and the City Manager's Office of Racial and Social Equity to ensure that staff understand the applicable legal framework, including relevant case law, as well as the policy objectives underlying the SOP. This coordinated training approach is intended to promote consistency, accountability, and respectful implementation in the field, and to support staff in carrying out their responsibilities effectively and lawfully.

Delegating authority to the City Manager or her designee to administratively amend the SOP and related documents in coordination with the City Attorney's Office will allow the City to respond more efficiently to future legal, operational, or resource changes without returning to City Council for routine procedural updates. This will allow the Administration to pivot quickly in response to rapidly changing case law and as opportunities for greater efficiency are identified. In addition, this level of detail on operational procedures is not typically approved by the City Council and is appropriately within the City Manager's authority. Any further updates to the SOP or any other related procedures would be subject to the City Manager or her designee's approval, and any major changes would be notified via an informational memorandum to the City Council.

EVALUATION AND FOLLOW-UP

No evaluation and follow-up are associated with this action.

COORDINATION

This memorandum has been coordinated with the City Attorney's Office, City Manager's Budget Office, and Housing Department.

PUBLIC OUTREACH

This memorandum will be posted to the City's Council Agenda website for the March 3, 2026 City Council meeting.

COMMISSION RECOMMENDATION AND INPUT

No commission recommendation or input is associated with this action.

CEQA

Not a Project, File No. PP17-008, General Procedure and Policy Making resulting in no changes to the physical environment and File No. PP17-009, Staff Reports, assessments, Annual Reports, and Informational Memos that involve no approvals of any City action.

PUBLIC SUBSIDY REPORTING

This item does not include a public subsidy as defined in section 53083 or 53083.1 of the California Government Code or the City's Open Government Resolution.

/s/
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and Neighborhood Services

/s/
ZULMA MACIEL
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For questions, contact Olympia Williams, Deputy Director, Parks, Recreation, and Neighborhood Services, at olympia.williams@sanjoseca.gov.

ATTACHMENT:

Beautify San José Personal Property Impound Standard Operating Procedure

BEAUTIFY SAN JOSE
PERSONAL PROPERTY IMPOUND
STANDARD OPERATING PROCEDURE

1. PURPOSE AND APPLICABILITY

The purpose of this Standard Operating Procedure (SOP) is to establish consistent, lawful, and humane procedures for the impoundment, handling, storage, and return of personal property encountered during encampment abatement or encampment clean-up operations conducted by the City of San José (City) or its contractors.

This SOP applies only to personal property impounded in connection with encampment abatements. It does not apply to property impounded or disposed of as part of vehicle tows regulated by the California Vehicle Code, evidence collection for potential criminal or civil enforcement, abatements addressing immediate public health and safety concerns (*e.g.*, obstructing critical building or infrastructure, blocking public rights of way, within school buffer zone, *etc.*) or other non-abatement enforcement activities. The administrative process for general encampment abatement will be revised to reflect and conform to this SOP.

The procedures set forth herein are designed to ensure compliance with constitutional protections against unlawful seizure and deprivation of property, while balancing public health, operational efficiency, and the principles of fairness, accountability, and transparency in City operations.

2. AUTHORITY AND IMPLEMENTATION

This SOP is issued by the Department of Parks, Recreation, and Neighborhood Services (PRNS), through Beautify San José (BSJ), pursuant to authority granted by the City Council. It supersedes all prior SOPs, policies, or procedures governing the handling, storage, or disposal of personal property during encampment abatements. Upon approval by the City Council, the Director of PRNS may amend or modify this SOP as necessary, in coordination with the City Attorney's Office, without further action by the City Council.

3. DEFINITIONS

“Abandoned Property” means property that, based on the totality of the circumstances and specific and objectively verifiable facts, appears to have been intentionally discarded or relinquished by its owner. A person's express refusal to remove or store an item may serve as evidence of abandonment. Property that is

merely unattended, without further indicia of the intent to abandon, should not be treated as abandoned.

The following circumstances create a presumption that property is abandoned and may be disposed of:

- (1) The property is placed out for collection with solid waste or recyclable materials or is placed in the same manner on a date contemporaneous with a community clean-up, neighborhood collection event, or similar activity.
- (2) The property is not associated with an encampment, and a reasonable person would not leave the item unattended for the period it has remained, considering the item's location (e.g., sidewalk, roadway, or other City property), the nature or type of the item, the risk of theft or loss, and its susceptibility to weather or damage.
- (3) The property constitutes illegal dumping under San José Municipal Code Chapter 9.10, including materials deposited in a manner inconsistent with the lawful use of public space.
- (4) Property found outside the designated 12-foot (width) by 12-foot (length) by 10-foot (height) (12x12) space during the impound process, as described below.
- (5) The owner, when present, affirmatively disclaims any ownership or interest in the property or expressly declines removal or storage.

The presumption of abandonment may be overcome by facts demonstrating that the property was not intentionally discarded, including signs of ownership, apparent value or use, or proximity to personal living space. **Clearly identifiable personal effects that, by their nature, are indispensable life necessities to establish an individual's identity or to maintain the individual's health, including government issued identification and prescribed medications, should be impounded and handled consistent with this SOP.**

"Abatement" means an operation initiated by the City to remove an encampment from public or private property.

"BSJ Team Lead" means the City employee designated by BSJ to oversee and coordinate an encampment abatement operation, including on-site supervision and compliance with this SOP.

"Bulk Personal Property" means any Personal Property, excluding a constructed tent or an operational bicycle, walker, crutch, or wheelchair, that is too large to fit in a 60-gallon container with the lid fully closed. Examples include, but are not limited to, sheds, structures, mattresses, couches, chairs, or other large furniture or appliances.

"Contraband/Evidence of a Crime" means items identified as evidence of a crime, including but not limited to weapons, drug paraphernalia, or stolen

property. Such items must be turned over to the San José Police Department (SJPD) and handled under SJPD's evidence and property procedures.

"Encampment" means any location used to establish a temporary place of shelter, which may be identified by the presence of bedding, sleeping bags, fires or stoves, or structures such as tents, lean-tos, or huts.

"Hazardous Materials" means solid waste, or a combination of solid wastes, which, because of its quantity, concentration, or physical, chemical, or infectious characteristics may:

- (i) cause, or significantly contribute to, an increase in mortality or serious irreversible or incapacitating reversible illness; or
- (ii) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Hazardous Materials include, but are not limited to, flammable or combustible materials, needles or sharps, biohazardous or human waste, batteries, toxic substances or chemicals, or cleaning agents.

"Perishable Items" means items that are subject to decay, spoil, or rot, including food or other organic materials.

"Personal Property" means property that is reasonably recognizable as belonging to a person and has apparent use, and that does not fall within the categories of Trash, Hazardous Materials, Perishable Items, Abandoned Property, or Contraband. Examples include, but are not limited to, identification or medical records, medications, jewelry, eyeglasses, radios, tools, durable medical equipment, stoves, generators (if emptied of fuel), photographs, backpacks, tents (unless soiled or contaminated), pots, pans, and bicycles with all parts attached.

"Trash" means any item that, in its present condition, has no apparent utility. Trash includes, but is not limited to, improperly discarded waste materials such as discarded packaging, containers, or refuse.

4. LEGAL AND POLICY FRAMEWORK

This SOP is guided by the Fourth, Fourteenth, and other applicable Amendments to the United States Constitution; controlling Federal and California case law governing the seizure, retention, and disposition of personal property; and the City's operational obligation to balance public health, safety, and environmental protection with the due-process and property rights of unhoused individuals.

5. PROCEDURES

5.1 Pre-Impound.

5.1.1 Advance Notice and Space Requirements

When providing advance notice of an abatement (typically 72 hours), staff shall inform individuals who may be subject to possible abatement of the Good Neighbor Guidelines and the 12x12 space requirement. Individuals must place all Personal Property within a 12x12 space during the abatement to ensure items are sifted through and possibly collected and stored pursuant to this SOP.

Requests made for Reasonable Accommodation during the encampment abatement noticing process will be directed to the Housing Department designee for further review.

Property left outside the 12x12 space at the time of impound shall be presumed abandoned and subject to disposal, except as noted above for clearly identifiable Indispensable Life Necessities.

5.1.2 Staff Preparation

The BSJ Team Lead shall review this SOP and the guidelines for identifying property for impound with all participating staff and contractors prior to beginning operations.

5.1.3 Site Documentation

Staff and contractors will photograph or video-record each site and surrounding area before commencing abatement.

5.1.4 Notice for Attended Property

On the date of abatement, staff shall give at least one hour of notice before impounding attended property and shall remind individuals of the 12x12 space requirement and the presumption of abandonment for items left outside that space. However, when immediate action is required—such as in a No-Encampment Zone, a City setback area, or in response to a public-health or safety emergency—the notice period may be modified or eliminated as may be necessary. **This limited notice requirement applies only to the impound of attended Personal Property and does not replace the broader advance notice obligations required for encampment abatements set forth under Section 5.1.1.**

5.2 During Impound.

5.2.1 Documentation of items

The BSJ Team Lead shall photograph or video-record and take contemporaneous notes for all items designated for storage, as well as items to be disposed, to document their condition and location.

5.2.2 Safety Walk-Through

The BSJ Team Lead may request that SJPD conduct an initial walk-through to search for active weapons, explosives, or other safety hazards.

5.2.3 Sorting of Materials

BSJ and contractor crews will then sort materials into categories:

- i. Personal Property to be impounded;
- ii. Trash, abandoned, or perishable items to be discarded;
- iii. Contraband or Hazardous Materials turned over to SJPD or otherwise disposed of per protocol.

5.2.4 Property Outside 12x12 Space

Unattended items found outside the 12x12 space will be presumed abandoned and subject to disposal, except for clearly identifiable Indispensable Life Necessities, which must be impounded and handled consistent with this SOP. Staff shall photograph or video-record each 12x12 area to show property within and outside the space.

5.2.5 Impound of Personal Property

Any item not clearly categorized as Trash, Abandoned, Perishable, Hazardous Material, or Contraband must be impounded as Personal Property.

5.2.6 Safety Exceptions

Staff are not required to handle or impound property that is commingled with human waste, needles, or other materials posing immediate health or safety risks.

5.2.7 Inspection of Containers

Bags, backpacks, or containers may be opened to verify contents, not to inventory every item.

5.2.8 Tent and Structures

Unless unsafe to do so, tents or other structures should be disassembled to check for Personal Property. Items found inside tents or structures within the 12 x 12 that qualify as Personal Property must be impounded.

5.2.9 Documentation of Impounded Property

All impounded property will be photographed with a visible date, location, and package ID. Two people, either two City staff or a combination of at least one City staff and one contractor, will be present for documentation.

5.2.10 Labeling

Property will be placed in clear bags labeled with the date, location, owner's name (if known), and tag number. Two people, either two City staff or a combination of at least one City staff and one contractor, will be present and participate in the labeling.

5.3 Post-Impound Handling.

5.3.1 Transportation

BSJ or its contractor will transport impounded property to a designated City storage facility. Two people, either two City staff or a combination of at least one City staff and one contractor, will be present and participate in the transportation of impounded property.

5.3.2 Secure Documentation

All photographic documentation will be uploaded to a secure City folder with date and location identifiers.

5.3.3 Storage Periods

Bulk Personal Property shall be stored for a minimum of 14 days. All other Personal Property shall be stored for a minimum of 30 days.

5.3.4 Disposal of Unsafe or Oversized items

Items that are excessively large and not otherwise Bulk Personal Property, or are structurally unsound, contaminated, or create safety hazards may be photographed or video-recorded and discarded without storage. Two people, either two City staff or a combination of at least one City staff and one contractor, will be present and participate in the disposal of impounded property.

5.4 Return of Impounded Property.

5.4.1 Scheduling Return of Personal Property

Individuals or their representatives seeking to reclaim property may contact BSJ through the personal property phone number or email address to schedule a return appointment at an agreed upon location and time. For staff safety and property security reasons, the location of the storage facility will not be made publicly available. Staff will endeavor to respond to voicemails or emails within 72 hours of receipt.

5.4.2 Locating Property

Staff will review photo records and inventory logs to locate the claimed item(s).

5.4.3 Appointment and Labeling

If located, staff will label the item with the claimant's name and schedule a location and 30-minute appointment window for return of property.

5.4.4 Claimant Verification

Staff shall attempt to verify the claimant's identity by requesting a valid photo ID. If the individual does not have identification, staff will photograph the individual prior to releasing the property. The claimant shall sign a release form affirming their identity, acknowledging receipt of the listed items in their current condition, and waiving any claims against the City.

5.4.5 Complete Retrieval

Claimants must remove all property at once; sorting or leaving items behind is not permitted.

5.4.6 Third-Party Retrievals

Property shall only be released to third parties, *i.e.*, a representative of the claimant, upon the written request of the claimant to avoid mistaken or fraudulent claims.

6 TRAINING AND DOCUMENTATION

6.1.1 Biannual Training

All BSJ and contractor staff participating in abatements are to receive bi-annual training on this SOP, including constitutional protections, notice requirements, and the procedures for distinguishing Personal Property from non-personal items.

6.1.2 New Personnel Training

Newly assigned BSJ and contractor personnel shall be trained before their first field assignment.

6.1.3 Recordkeeping

BSJ will maintain training records and copies of this SOP in a centralized SharePoint directory accessible to field supervisors.