ROOT POLICY RESEARCH

MEMORANDUM

To:	Marcy Yoder, City of Fort Collins
From:	Mollie Fitzpatrick, Avilia Bueno, and Julia Jones, Root Policy Research
Re:	Peer Community Research: Rental Registry Policy and Implementation
Date:	June 8, 2021

Peer Community Research

Communities interviewed. Root interviewed the following peer communities about their rental regulations. These communities were selected because they are 1) university anchored (with a few exceptions); and/or 2) have unique program requirements or methods of enforcement.

- Ames, Iowa
- Austin, Texas
- Boulder, Colorado
- Corvallis, Oregon
- Kansas City, Missouri

- Lawrence, Kansas
- Manhattan, Kansas
- San Marcos, Texas
- Seattle, Washington
- Westminster, Colorado

Elements of regulations. While each community has unique challenges and utilizes different rental regulations, there are common elements that constitute a rental registration, licensing, or inspection program. This section of the memorandum will discuss the pros and cons of elements of the peer community regulations and include recommendations for the City of Fort Collins to consider when crafting their rental regulations. Generally, rental regulations include the following elements:

- Registration or licensing requirements,
- Methods for enforcement and penalties for noncompliance,
- Fee structure for funding the program,
- Inspections either by request or systematized,
- Landlord and tenant outreach practices,
- Local considerations, and
- Implementation.

Registration versus licensing. Clear expectations and terminology are vital to the successful implementation of rental regulations. In peer communities interviewed, many had registration programs that acted as licenses. For the purposes of this memo registration and license are defined as follows.

Registration programs can be either mandatory or voluntary and involve collecting information from property owners and landlords. Registration programs are typically complaint based and rarely involved proactive enforcement. The following communities are considered registration programs by this definition:

- Austin
- Corvallis
- Kansas City
- Manhattan
- Westminster

Licensing programs are mandatory and require property owners or landlords complete an application and, in some cases, complete an inspection prior to renting the property. Licensing programs are typically proactively enforced, but inspections can be either complaint based or proactive. The following communities are considered licensing programs by this definition:

- Ames
- Boulder
- Lawrence
- San Marcos
- Seattle

Most peer communities interviewed indicated that mandatory licensing programs with inspections have the best outcomes for health and safety of units and accuracy of information. Mandatory licensing programs generally include an inspection and a complete application prior to renting the unit. However, lack of political will, landlord opposition, and administrative burden were cited as the primarily reasons some communities were unable to implement a mandatory licensing program.

Among communities that have registration programs that are complaint based, the condition of rental properties still improved. There were concerns about equity within complaint-based systems because residents fear retaliation from landlords—this fear is particularly acute among undocumented residents, residents with a disability, seniors, low income residents, and racial and ethic minorities. While there are equity concerns with a complaint-based system, the registration of rental properties was still largely successful in communities for opening up avenues for communication with rental property owners, landlords, and property managers.

The biggest concern about rental registration programs, particularly voluntary programs, are that they "have no teeth." These programs rely on property owners, landlords, or management companies to voluntarily register and maintain accurate

information within the registration system. Communities interviewed indicated these programs have lower participation rates compared to mandatory licensing programs.

Some communities build in deterrents for repeat offenders—properties that are routinely cited for code violations—through inspection schedules. The City of Austin's rental registration program is unique in that it only applies to repeat offenders. If properties in the city exceed two code violations within a 24-month period they are required to register with the program and receive, at a minimum, annual inspections for at least two years. Properties must move into compliance before they can be removed from the program.

Programs that rely on code violations to trigger inspections or registration have a greater impact on larger properties—unless the number of citations is scaled to the size of the property. For example, a 400-unit apartment complex can easily have five code violations in a year, whereas the same five code violations on a single family home is more concerning for health and safety.

Peer communities said:
"Registration is no good without a license you can withhold and without an inspection."

"Voluntary registration programs you might as well not waste your time."

"[I] would be somewhat afraid of trying to do a full registration program with periodic inspections."

"It is punitive to require all properties to register."

Recommendations.
- Require all rental properties to register with the city and obtain a license to rent their unit.

- Require all rental properties to pass an inspection prior to renting units.

- Provide a three-year introductory period to provide education, allow property owners to ensure properties are habitable for inspection, and get properties licensed prior to enforcement.

Enforcement. Peer communities utilize a wide variety of enforcement methods from proactive to complaint based. Proactive enforcement is conducted through staff investigation into parking permits, rental advertising online or in the community, and utility billings. Complaint based enforcement requires a community member to report the issue to the department. Most communities interviewed lead with education and open a dialogue to give landlords the opportunity to comply prior to moving to penalties.

Communities interviewed expressed the need to have decision makers and city attorney(s) in agreement about suitable penalties for violations because they will

ultimately take action when violations escalate. Peer communities interviewed utilize a variety of penalties including revoking or suspending rental licenses, vacating the property, allowing tenant rent abatement, cash citations, tax liens, tickets or administrative citations, and finally summons and prosecution.

Most communities require a local contact—some specify the distance they can live from the city—in order to provide timely correspondence and fix maintenance issues. Local contacts also ensure that fewer violations are escalated due to unresponsiveness of out of town landlords and owners. Many communities work closely with owner property management companies to resolve issues quickly without escalation.

Peer communities said:

"Very rare to have to issue citations to landlords or tenants. We generally start with a door hanger to notify tenants about requirements, but it is ultimately the landlord's responsibility to come into compliance."

"We approach enforcement mainly as pro-active where able, and definitely re-active in all cases. We take an 'education first' approach to give landlords the opportunity to comply with city codes prior to moving to penalties."

"Safe and healthy living environment is our job...we are successful because we are reasonable."

"The real goal for registration was to provide better access to someone who could fix things [like landlords and owners]. With out of state owners, it takes months to get grass mowed."

"Getting out of state landlords has been a huge benefit for us. They need to put local contact for repairs and this is public information so tenants can contact them as well."

Recommendations.
- Lead with education to tenants and landlords before issuing a citation.

- Consider requiring landlords that rent four or more units and live more than 50 miles from the city to designate a local contact with authority to fix maintenance issues and make repairs.

- Consult the city's legal team to understand the options for enforcement penalties and escalation of violations. Review enforcement tactics with City Council.

Fee structure. The communities interviewed either directly fund their program through fees collected, allocate fees to the general fund to fund the program through the general fund, or collect fees and other department specific funding to run the program. Most communities are cost neutral and self-sufficient, while some communities are working toward that goal or using a unique funding structure. Cost recovery depends on the frequency of registration/licensing renewals (ranges from 1 to 4 years in communities) and the fee structure and frequency of inspections (varies).

Communities where fees collected fund the program include Ames, Boulder, Kansas City, Manhattan, and Seattle. Programs funded through the general fund include Corvallis, Lawrence, San Marcos, and Westminster. Programs funded through the general fund can be cost neutral if fee revenue contributed to the general fund is adequate. Finally, the City of Austin charges a small fee that covers the cost of registration paperwork and funds the remainder of the program's administration (staff, inspectors, etc.) through a clean community fee—$4.25 collected monthly as part of utility billing.

Communities interviewed indicated the fee calculation itself can be a challenge. Fees that are calculated per property have a larger impact on small properties whereas fees calculated per unit have a larger impact on large properties. Interviewees suggested the fee calculation be tailored to the amount of staff time and resources properties require. A tiered fee based on the size of the property was preferred.

The fee structure for the program determines the staffing capacity. The communities interviewed indicated the following staffing levels at the time of the interview.

- Ames—3 full time inspectors
- Austin—8 full time inspectors, 1 supervisor
- Boulder—3 full time licensing team, inspections conducted by 3rd party
- Corvallis—2 full time staff, 1 part time code compliance specialist
- Kansas City—4 public health specialists, 6 field staff, 2 supervisors, 4 clinical staff
- Lawrence—3 inspectors
- Manhattan—1 clerical, 1 supervisor, 2 inspectors
- San Marcos—0 dedicated staff
- Seattle—1 call center, 3 administrative, 1 cashier, 3 inspectors, 1 senior inspector, 1 manager
- Westminster—3 inspectors, 1 part time admin

Peer communities said:

"Self-sufficient; if it becomes a point where the program is not sufficient, then we would raise the fee."

"We are not allowed to profit from our program. Must be cost of service. Difficult to figure out how to separate repeat offender activities from regular code enforcement. Right now, we expend more time and money trying to collect the fee than the fee is."

"When they look to hire people, think outside of the box. We are way overqualified for what we do—our skillsets are helpful for the job we have. The people are important."

"Funded through the registration fee. When talking to anyone against program we can say, 'we don't take from general fund. Landlords pay for it, just like health inspections, hotel inspections.' "

"We ended up having to borrow more when getting started. It cost more than we thought to get things running. We also, overestimated the number of rental properties and set fees too low as a result."

Recommendations.
- Design the fee structure to cover the costs of running the program.

- Charge fees based on the number of rental units under ownership, not based on the number of properties. This ensures the administrative burden is consistent with the fee charged.

- Assume startup costs will be more than you think.

- Hire full time staff dedicated to this program, particularly inspectors.

Inspections. Communities interviewed are almost evenly split between complaint-based inspections (Manhattan, Corvallis, Kansas City, and San Marcos) and mandatory inspections (Ames, Austin, Boulder, Lawrence, Seattle, and Westminster). Complaint based inspections require someone to report the property to the city, and some interviewees raised the issue of equity and fear of retaliation in complaint-based programs.

Mandatory inspection programs are generally required between every year and every six years. Three of the communities interviewed offer a reward for a good inspection. In Ames if you pass your inspection the first time you get put on a four-year schedule as opposed to an annual. In Lawrence if you have fewer than five violations you switch from a three-year schedule to a six-year schedule. Westminster can modify inspection periods based on performance.

Another key attribute of mandatory programs interviewed is unit sampling. Austin, Lawrence, and Seattle all rely on unit sampling for inspections as part of their rental regulations. Generally, 10 percent of units are inspected in sampling programs. However, in Lawrence the unit sampling is capped at 15 units total for each property owner. Staff noted this is not effective for large properties and owners with multiple properties in the program. Finally, Seattle uses a computer program to pull randomized properties for inspection to prevent discrimination and targeting.

Among communities interviewed, most inspect HUD properties as well—even though they have their own inspection requirements. While communities indicated this does cause some inefficiencies, the standards and requirements are different for HUD inspections. In one of the communities interviewed, most of their citations are in units owned by the housing authority and in another they had to go back and revise the

ordinance to include Section 8 properties because one third of complaints came from those properties. Interviewees advised to include publicly subsidized housing units in the inspection program.

Peer communities said:
"Reward those that have units that are maintained."

"If I had a choice, I would find a way to staff city inspectors for consistency and knowing the codes specific to [our city]. There is a training element for licensed inspectors, and we do not have control of consistency… a city inspector would give the program more consistency and take away the price difference."

"Registration is no good without a license you can withhold and without an inspection."

Recommendations.
- Require mandatory life and safety inspections of rental properties to receive a license to rent units.

- Provide a tiered inspection schedule to alleviate the burden of inspections on landlords who maintain their property to a higher standard. Consider the number of citations received during initial inspection as a gauge for the inspection period.

- Inspect all properties at least once every four years.

- Inspect all rental properties, even if they are inspected through another program. Explore opportunities to coordinate inspections to alleviate administrative burden on landlords.

- Hire city inspectors to perform rental inspections but allow landlords to choose a private inspector if they wish.

Landlord and tenant involvement. Open communication is key. Communities advised to open a dialogue with landlords and tenants during program development, and keep the dialogue going once the program is up and running. Quarterly touchpoints are ideal to facilitate learning, training, and identify pain points in the process. Particularly for students, education is constant. Many students are living alone for the first time and do not understand the norms and behaviors to be a good neighbor.

Most landlords want to do a good job. Interviewees stressed the importance of having a lot of upfront conversations and including them in the implementation process. Some communities market the program as insurance for landlords as well to ensure tenants are taking good care of their property. It is important to have a clear message for why the community is pursuing rental regulations and how the program will ensure good landlords are not penalized. Most communities focus on keeping costs low and focusing on health and safety issues.

Tenants are generally compliant with the program and permit entry into units for inspection. In some cases, it is difficult to balance tenants' desires for swift compliance and the need to properly notice landlords and provide ample time for them to fix the issue.

Peer communities said:
"Most of the landlords want to do a good job."

"Start with an open and collaborative approach with stakeholders on both sides—include tenants as well."

"Ordinance was repealed because of opposition. There is no buy-in and there never has been. The prevailing thought is buyer beware. Students should know if it is unsafe. They need to step up and get a clue—we don't need to police landlords."

"Focus on: 'Let's not wait for a tragedy or someone to die to realize this is important!' It takes a lot of talking about why we are doing this."

"You will always have opposition. It is really dependent on how you frame it—documentation and illustration of the problems is critical."

"You need to have people on your team that fit in. Don't dress like police officers—you are not there to look for stuff or snitch. If there is stuff out in the open shame on them, but we are not adversarial."

"The tone was this is going to happen let's talk about how to make it workable."

Recommendations.
- Convene a stakeholder advisory committee to collaborate on process efficiencies, program cost, and implementation timelines to ensure there is an open avenue of communication.

- Maintain quarterly meetings with stakeholders and residents to identify issues with the program implementation, discuss progress and effectiveness, and provide education.

Local considerations.
Mobile home parks, energy efficiency, and university context are all local considerations for the City of Fort Collins. The responses from peer communities regarding these local considerations are summarized below.

Mobile homes. Seven of the ten communities interviewed inspect mobile homes if they are rentals. Communities that do not inspect mobile homes either have state requirements for them to be licensed or they are inspected by other entities. Communities that do inspect mobile homes only inspect units where the unit itself is rented—lot rent does not qualify as a rental if the unit is owned by the occupant.

Energy efficiency. Only one of the communities interviewed incorporate minimum energy efficiency regulations into their rental regulation program. Communities without energy efficiency standards indicated that they want to keep the focus on health and safety of the units and many landlords do not have the resources to address minimum energy efficiency. Communities did clarify that basic weatherization and safety were included in the inspections and that new construction residential is generally held to a higher standard for energy efficiency.

The City of Boulder adopted their SmartRegs in 2012 to help address energy and climate goals within rental housing stock. The city allowed two rental registration cycles (8 years) for property owners to meet the new requirements. A license is a four-year term and requires the property to meet a base level of energy efficiency and a life safety inspection. The energy requirements are a one-time certification, and the life safety inspection is required at each four-year renewal term. Early adopters of the energy efficiency standards received incentives including rebates and upgrades. The city used grants and program funds to support initial incentives.

In the early stages of the program the city was providing free energy audits as initial inspections. The city designed an inspection and training program tailored to their regulations. All inspections are done by a third party and costs are market driven. The biggest pushback the city received was the cost of upgrades to properties and the cost of inspections—particularly if the property required multiple inspections.

University context. University anchored peer communities stress the importance of education and engagement with the student population. Peer cities conducted outreach in a variety of ways including meeting with student newspaper, reserving an ex oficio seat on City Council for a student, attending back to school events, going door to door, engaging the student conduct office, and including students in stakeholder meetings. Corvallis and San Marcos take student engagement one step further by forming partnerships with local universities to monitor off campus living.

- Special response notices (SRN) in Corvallis allow code enforcement or police to report a nuisance violation with an SRN which is available to the Oregon State University code of conduct office. The student code of conduct extends off campus and into the community. SRNs notify the university of violations so the school may discuss the issue with students. Staff report this program has been very successful in reducing or addressing nuisance violations with students living off-campus.

- The Act Ally program in San Marcos is a partnership between the university and landlords. Landlords register for the program—there is no fee—and if landlords maintain their properties, they are included on the off campus living list. The university has a long-standing relationship with apartment complexes and this program has had some success. However, the program was rolled back because of the legal and liability issues of program managers certifying properties to rent.

Landlords can now register through an online portal to get into the program, but the university provides no guarantees about the conditions of the properties.

Recommendations.
- Treat mobile and manufactured housing units the same as other rental units if the unit itself is occupied by a renter. Lot rent should not be considered a rental property trigger if the unit is owner occupied.

- Review energy efficiency standards for new construction in the city. Reevaluate the introduction of minimum energy efficiency standards for existing rental properties in five years to avoid overburdening landlords and administrative staff while implementing initial rental regulations. Life and safety issues should be the priority.

- Partner with Colorado State University code of conduct office to craft a notice system that involves the university in nuisance violations in off campus student housing.

Implementation. Communities interviewed emphasized the importance of messaging, education, and engagement during implementation. Messaging for the program should "focus on the why," which is for health and safety of tenants and preservation of rental housing stock. Position the program as educational and do not take sides between the tenant and landlord. Implementation in most communities took two to three years to educate and work rental properties through the system. Interviewees recommended to start early with education and engagement. For engagement, it is important to work with stakeholders and alert them that this program is coming and is supported politically, but the design and implementation of the program is open for discussion. Have an open conversation about how to make the program work for everyone.

Communities interviewed spoke about the importance of fairness, balance, and neutrality in implementation. The process for filing a complaint should be systematized in order to avoid access to the "back door" for politically connected residents. The process for filing a complaint and registering properties should also be designed in a way to avoid unnecessary administrative burden on staff.

Many communities spoke about their experience with computer systems and software. IT can either work for you or against you. One community struggled with issuing letters of compliance for different number of years to reward good behavior another had to revert to paper applications and manual data entry because their IT system was ineffective. Starting an inventory of rentals was challenging in communities interviewed because they were starting from scratch. Startup almost always took longer and cost more than anticipated.

Peer communities said:
"Advice for them: ramping up is a great idea! Get way out in front of it. Take two years to create awareness; you have to tell people time and time again."

"There is a group of renters out there that do not know the basics they should know. If you are involved in government or housing it is your responsibility to advocate for those people. Start with basic life safety. Otherwise, you missed the mark."

"How you spin the program is important...you are there to educate. We have owners that love us and are grateful and of course there are some that get upset. People who yell the loudest are the ones that need it."

"Startup was a real challenge. Before us there was no inventory of rentals. There was no good information."

"Wish we looked more at licensing software, for example, business licensing."

Recommendations.
- Create a community education and engagement plan to guide outreach efforts over the first three years of implementation. Include education, stakeholder engagement, student engagement, clear expectations on timing, and key messaging about the purpose and jurisdiction of the program regulations.

- Formalize the process for filing and investigating complaints to remove biases.

- Work closely with the city's IT staff to identify the unique software needs to administer the program and register properties efficiently.

Occupancy. Peer communities, particularly university anchored communities regulate occupancy similar to the City of Fort Collins—through the number of unrelated individuals that can live together. Among peer communities, occupancy is measured using the following methods: adults per bedroom, number of unrelated individuals by type of unit, and limits on unrelated individuals defined by zoning district. Most communities do not proactively enforce these ordinances—and in some states it is illegal to—while others monitor parking permits, party complaints, number of individuals receiving mail, and rental inspections to identify households in violation.

In Iowa and Oregon, local realtors and landlords lobbied the state to pass a law making it illegal for jurisdictions to regulate or enforce occupancy based on familial status. Additionally, regulating the number of unrelated individuals that can live together has been challenged as a violation of the Fair Housing Act. A best practice is to not define family through the zoning code to better facilitate inclusive housing arrangements, reflect changing preferences in sharing of residential units, and instead regulating through occupancy restrictions to prevent overcrowding. Additionally, it is a best practice to focus definitions of families—or preferably households—on the functional aspects of relationships instead of familial relatedness.

Recommendations.
- Revise the occupancy ordinance to regulate based on household functionality rather than familial relatedness.

Recommendation Summary

- Licensing

  - ➢ Require all rental properties to register with the city and obtain a license to rent their unit.

  - ➢ Require all rental properties to pass an inspection prior to renting units.

  - ➢ Provide a three-year introductory period to provide education, allow property owners to ensure properties are habitable for inspection, and get properties licensed prior to enforcement.

- Enforcement

  - ➢ Lead with education to tenants and landlords before issuing a citation.

  - ➢ Consider requiring landlords that rent four or more units and live more than 50 miles from the city to designate a local contact with authority to fix maintenance issues and make repairs.

  - ➢ Consult the city's legal team to understand the options for enforcement penalties and escalation of violations. Review enforcement tactics with City Council.

- Fee structure

  - ➢ Design the fee structure to cover the costs of running the program.

  - ➢ Charge fees based on the number of rental units under ownership, not based on the number of properties. This ensures the administrative burden is consistent with the fee charged.

  - ➢ Assume startup costs will be more than you think.

  - ➢ Hire full time staff dedicated to this program, particularly inspectors.

- Inspections

  - ➢ Require mandatory life and safety inspections of rental properties to receive a license to rent units.

  - ➢ Provide a tiered inspection schedule to alleviate the burden of inspections on landlords who maintain their property to a higher standard. Consider the number of citations received during initial inspection as a gauge for the inspection period.

  - ➢ Inspect all properties at least once every four years.

  - ➢ Inspect all rental properties, even if they are inspected through another program. Explore opportunities to coordinate inspections to alleviate administrative burden on landlords.

- ➢ Hire city inspectors to perform rental inspections but allow landlords to choose a private inspector if they wish.

- ■ Landlord and tenant involvement

  - ➢ Convene a stakeholder advisory committee to collaborate on process efficiencies, program cost, and implementation timelines to ensure there is an open avenue of communication.

  - ➢ Maintain quarterly meetings with stakeholders and residents to identify issues with the program implementation, discuss progress and effectiveness, and provide education.

- ■ Other considerations

  - ➢ Treat mobile and manufactured housing units the same as other rental units if the unit itself is occupied by a renter. Lot rent should not be considered a rental property trigger if the unit is owner occupied.

  - ➢ Review energy efficiency standards for new construction in the city. Reevaluate the introduction of minimum energy efficiency standards for existing rental properties in five years to avoid overburdening landlords and administrative staff while implementing initial rental regulations. Life and safety issues should be the priority.

  - ➢ Partner with Colorado State University code of conduct office to craft a notice system that involves the university in nuisance violations in off campus student housing.

- ■ Implementation

  - ➢ Create a community education and engagement plan to guide outreach efforts over the first three years of implementation. Include education, stakeholder engagement, student engagement, clear expectations on timing, and key messaging about the purpose and jurisdiction of the program regulations.

  - ➢ Formalize the process for filing and investigating complaints to remove biases.

  - ➢ Work closely with the city's IT staff to identify the unique software needs to administer the program and register properties efficiently.

- ■ Occupancy

  - ➢ Revise the occupancy ordinance to regulate based on household functionality rather than familial relatedness.

Appendix: Peer Community Program Details

	Registration v. License	Voluntary v. Mandatory	Registration/ Licensing Period	Registration/ Licensing Fee
Ames, Iowa	License (registration and letter of compliance)	Mandatory	Annual	Single family $50; duplex $100; multifamily $23-$30 per unit
Austin, Texas	Registration	Triggered by code violations within a 24 month period	Annual; in the program for at least 2 years	$372 per property
Boulder, Colorado	License	Mandatory	4 years	$190 per SF unit or per building
Corvallis, Oregon	Registration	Mandatory	Annual	$15 per unit; escalation factor of $1 every odd number year
Kansas City, Missouri	Registration	Mandatory	Annual	$20 per unit
Lawrence, Kansas	License	Mandatory	Annual	$14-$17 per unit
Manhattan, Kansas	Registration	Mandatory; not enforced	One time; update as needed	None
San Marcos, Texas	Registration	Mandatory	One time; update as needed	None
Seattle, Washington	License	Mandatory	2 years	$70 for property and 1st unit; $15 per additional unit
Westminster, Colorado	License (properties with 4+ units); Registration otherwise	Mandatory	2 years	$50 per unit

	Inspections Complaint or Proactive	Inspection Frequency	Inspection Fee	Local Contact Required
Ames, Iowa	Proactive	1 to 4 year rotation; frequency based on performance	Included in registration fee; 3+ inspections $50 each	No
Austin, Texas	Registered repeat offender properties	Annual	No fee for inspection; clean community fee $4.25/month utility charge funds code enforcement	No
Boulder, Colorado	Proactive	4 years	Third party inspectors	Within 60 minutes of Boulder
Corvallis, Oregon	Complaint based	N/A	N/A	No
Kansas City, Missouri	Complaint based	N/A	N/A	No
Lawrence, Kansas	Proactive	3 years typical; 5 or less violations, 6 years	$50 per unit	Resident agent within 40 miles of the city
Manhattan, Kansas	Complaint based	N/A	N/A	60 mile radius or appoint a local agent
San Marcos, Texas	Complaint based	N/A	N/A	Out of state contact
Seattle, Washington	Proactive; random selection of 10% of all rental units in city per year	At least once every 5-10 years	$175 for property and 1st unit; $35 per additional units	Out of state contact of local for repairs
Westminster, Colorado	Proactive	2 and 4 year schedule of inspections based on property age	$40 per unit	50 miles from unit, need property manager to take summons, notices of noncompliance, and oversee inspections

	Occupancy Standards	Cost Recovery	Administration	Staffing
Ames, Iowa	1 adult per bedroom; capped at 5 adults	100%	Ames Fire Department	3 full time inspectors
Austin, Texas	Restricted by land use; 6 unrelated in SF; 3 unrelated per duplex	Covers registration, not staff	Code Department	8 full time inspectors, 1 supervisor
Boulder, Colorado	Determined by zone; 3 unrelated in low density; 4 unrelated in high density	100%; pre-2021 60% fee recovery, 40% general fund	Planning and Development Services	3 full time licensing team, inspections conducted by 3rd party
Corvallis, Oregon	Rule of 5; 5 unrelated	100%; fees paid through the general fund	Housing and Neighborhood Services	2 full time staff, 1 part time code compliance specialist
Kansas City, Missouri	5 unrelated	100%	Health Department	4 public health specialists, 6 field staff, 2 supervisors, 4 clinical staff
Lawrence, Kansas	Determined by zone	General fund	Planning and Development	3 inspectors
Manhattan, Kansas	4 unrelated	N/A	Fire Department; Risk Reduction Division	1 clerical, 1 supervisor, 2 inspectors
San Marcos, Texas	2 unrelated	N/A	Neighborhood Enhancement	0 dedicated staff
Seattle, Washington	6 unrelated	Working toward self-sufficiency	Department of Construction and Inspections	1 call center, 3 administrative, 1 cashier, 3 inspectors, 1 senior inspector, 1 manager
Westminster, Colorado	4 unrelated	100%	Building Division	3 inspectors, 1 part time admin