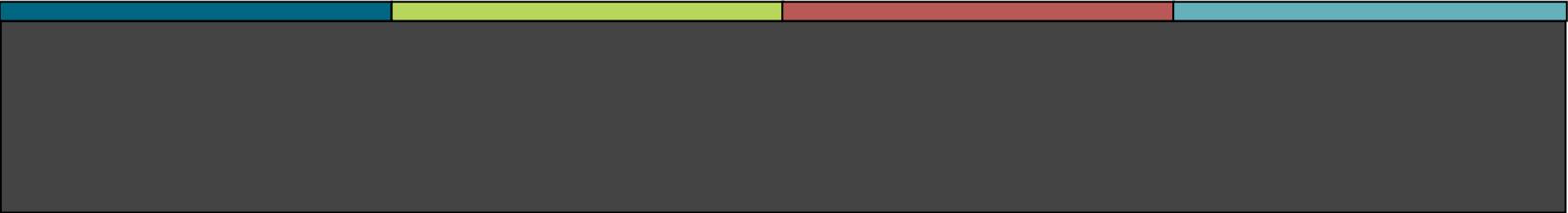

City of Philadelphia
Department of Licenses and Inspections

2019 – 2021
**STRATEGIC
PLAN**



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Letter from the Commissioner

Fellow Philadelphians:

I am pleased to share this strategic plan—the blueprint that the Department of Licenses and Inspections (L&I) will follow over the next three years (2019 through 2021) as we continue to construct the strong and modern building department that the City of Philadelphia needs and deserves. This plan is the result of intensive analysis and discussion to honestly assess where L&I is today, envision the future, and identify strategies and priorities to advance the Department to where it needs to be.

This plan embraces many long-term recommendations made by Philadelphia City Council, the City Controller’s Office, the City’s Office of the Inspector General, and the Mayor’s Special Independent Advisory Commission, following the horrific Salvation Army building collapse on June 5, 2013. The scores of recommendations already implemented have established a sound foundation for continued improvement.

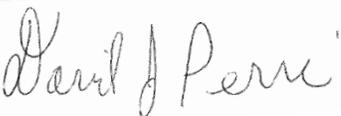
I am thankful to L&I’s leadership and staff for the knowledge, critical thinking, and dedication to public service that they have brought to the development of this plan. The wise counsel of the Building Safety Oversight Board and its chair, Michael Nadol, has been invaluable, as has the guidance of Angelina Ruffin and Talia Stinson of the City’s Office of Performance Management.

This year, the Department will undergo a transformational technological shift through the completion of our eCLIPSE project—essentially, the creation of an “L&I online”—that will drive improvements in customer service, enforcement, and transparency. These changes will propel the Department forward, towards our unwavering goal of building and sustaining a safer Philadelphia.

Although our plan is ambitious, we remain acutely aware of our Department’s limitations. The city’s growth, driven by and reflected in our current building boom, and its burdens, as our aging and neglected housing stock deteriorates, continue to challenge L&I, each and every day. We need to be innovative in our efforts to hold property owners, businesses, and contractors to their legal responsibilities to construct, maintain, and use buildings safely.

This plan, like Philadelphia itself, is a work in progress, and we are committed to learning from your feedback to constantly improve our performance. More than ever, we at L&I are deeply devoted to serving this great city.

Yours truly,



David Perri, P.E.
Commissioner



Table of Contents

Letter from the Commissioner	1
Strategic Vision	3
About the Department of Licenses and Inspections	4
2016 – 2018 Departmental Accomplishments	5
Licenses and Inspections: Performance Measure Snapshot—Fiscal Year Comparison	10
Looking Ahead: Objectives, Goal Setting, and Defining Success	11

Strategic Vision

Philadelphia's story is often described as a tale of two cities, and that is certainly the case in terms of construction activity and business investment. Some sections of the city, benefitting from new investments, are reinventing themselves and are experiencing construction activity and revitalization at a dizzying pace. Concurrently, the city as a whole suffers from the highest deep poverty rate of any large city in the country and some sections of the city continue to deteriorate due to lack of capital, lack of maintenance, and an aging building stock.

This dual dynamic of robust renewal and seemingly intractable poverty places severe pressures upon the Department of Licenses and Inspections and its limited resources. As a result, the Department must make critical, data-driven, strategic decisions concerning where to focus its limited resources and budget. Private demolition and new construction, if not done properly, pose a danger to the public, as do aging buildings experiencing vacancy and structurally-dangerous conditions.

Government, by itself, has but a fraction of the resources it would need to repair or demolish every unsafe building and inspect every business. A combination of public demolition, private demolition, a positive development climate, and effective code enforcement that holds building owners accountable, are necessary to meet the challenges. Do we pull resources from construction inspections to inspect existing buildings? Do we spend funds to further simplify the permit process to facilitate the building boom, or do we invest our limited resources into contracting more building demolitions? These and many more critical choices must be made.

The strategic direction that we believe best serves the City of Philadelphia has the following elements:

1. A state-of-the-art technology platform that residents, businesses, the construction industry, and other City departments can use to obtain needed permits, licenses, and information.
2. An increased use of third-party inspections and expertise to fill staffing and inspection program gaps.
3. A multi-faceted strategy to address dangerous buildings.
4. Up to date construction and property maintenance codes.
5. Robust interaction and communication with the public, businesses, and the building community.

As you explore this strategic plan, you will notice how much of our challenge is striking the right balance. We want to encourage new construction with code reform and a streamlined permit process, and we also want construction and demolition completed safely and with a minimum amount of disruption to the community. We want to use state-of-the-art technology and data analysis, but we realize that technology and data alone cannot solve all problems and that we also need face-to-face contact to engage residents and the business community. We strive to have the best trained workforce, but we realize that certain specialized skills are beyond the government's ability to hire, so we need to rely on consulting contracts and third-party inspections.

Strategic plans are all about making intelligent and forward-thinking choices. Please join us in shaping this plan as we continue to build a better and safer city together.

About the Department of Licenses and Inspections

The Department of Licenses and Inspections (L&I) champions building safety in Philadelphia, by enforcing compliance with City Codes governing construction, new buildings, and existing structures. L&I's responsibilities include building plan review and permit issuance; fire safety, construction, structural, and property maintenance inspections; monitoring and demolishing of dangerous buildings; emergency response; addressing public complaints; license issuance; educating and advising property and business owners, the building industry, and the public; and participation in court and administrative enforcement actions. Along with the Police and Fire Departments, the Department of Prisons, and the Office of Emergency Management, L&I is overseen by the City's Deputy Managing Director for Criminal Justice and Public Safety.

Vision Statement

To build and sustain a safer Philadelphia, L&I embraces best practices in technology and customer service to enable the public to access information, secure required approvals, and comply with building safety requirements in a convenient, reliable, and transparent manner. L&I achieves code compliance through collaboration, education, and effective enforcement measures that hold businesses, contractors, and property owners accountable.

Mission Statement

To enforce the City's Codes for the safe and lawful construction and use of buildings.

Core Values

The Department of Licenses and Inspections identifies and embraces these core tenets as organizational guiding principles:



2016 – 2018 Departmental Accomplishments

L&I achieved notable wins and made progress as a department over the past three years, including:

1. 58% increase in inspection staff since 2013

- “Great Recession” budget cuts had decimated ranks of L&I inspectors; in FY09 only 84 inspectors, including just 27 construction inspectors and six emergency response inspectors, were on staff.
- Since FY13, the number of inspectors has risen from 103 to 163.
- New inspectors undergo between six and eighteen months of in-house trainings and take national certification exams. They are then assigned to district offices for on-the-job training and supervised inspections.
- L&I inspectors, especially construction inspectors, complete more hours of in-house training than any other new City employees.

2. Early adoption of the 2018 Building Codes

- After years of operating under outdated building codes for commercial construction, Philadelphia became a national leader in modern code adoption when City Council passed a bill incorporating the 2018 International Building Code into Philadelphia law.
 - City Council moved the adoption bill quickly to meet state deadlines and Mayor Kenney signed the bill into law on June 6, 2018.
- Prior to adoption of the 2018 Codes, state law required that Philadelphia buildings be designed, constructed, and inspected under a patchwork of requirements pulled from the 2009 International Codes; the 2008 National Electrical Code; and sections from the 2015 International Codes, especially those relating to accessibility; plus, a list of additional Pennsylvania-specific regulations formulated by the state. This hodgepodge made building design overly-complicated and difficult and made the training of staff needlessly complex and confusing.
- The move to the 2018 Code series, is a leap to state-of-the-art technology, materials, research, construction practices, energy efficiency standards, and risk mitigation. It is a benefit to the design community and ensures a better trained inspection force.

3. Stronger building safety laws

In the last five years, Philadelphia has enacted and implemented 52 ordinances and put in place 18 new procedures designed to raise safety standards and increase accountability. City Council’s partnership has been invaluable in strengthening Philadelphia’s building safety laws even beyond the requirements of the International Building Code series. These ordinances include:

- Tougher demolition safety standards, including:
 - Imposing licensing and training requirements on demolition contractors
 - Creating a separate permit for demolitions, with associated mandatory inspections

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- Requiring a site safety plan including protections for neighboring property and pedestrian and vehicle traffic
 - Requiring safe sequencing of demolition activity to prevent premature removal of structural supports
 - Establishing a mandatory safety “keep out” safety zone around buildings undergoing demolition
 - Requiring a licensed engineer to continually supervise demolitions of buildings over three stories tall and/or being accomplished by mechanical methods
 - Prohibiting most demolitions when the average wind speed is over 20 miles per hour
 - Instituting dust-control safety measures at demo sites
 - Broadening enforcement authority at demolition sites
 - For the first time, all Philadelphia fire escapes must be professionally inspected by a third-party structural engineer to ensure that they are in safe condition.
 - Establishing qualifications for licensed engineers and other technical experts conducting “Special Inspections,” which are required by the Building Code for complex and/or hazardous construction processes.
 - Requiring training and certifications for mobile crane operators.
 - Mandating basic OSHA safety training for construction workers and more advanced OSHA training for construction site supervisors.
 - Increasing permit and license fees to support the Department’s expanded enforcement.
 - Legislation to require sprinklers in portions of five- and six-story buildings and upgraded fire alarms systems in rooming houses and group living situations.

4. Establishment of Audits and Investigations Unit

L&I’s new Audits and Investigations Unit runs an administrative hearing process that holds contractors accountable for consistently falling short of Code requirements. Since its launch in 2017, the Unit has investigated 250 construction sites and has held 26 hearings. Seventeen hearings have resulted in contractor license suspension or revocation; an additional five received probation or letters of official warning.

In coordination with the Department of Revenue, the Unit has designed a joint general contractor audit program to promote a level playing field for law-abiding contractors. Under the program, investigators audit permits, examine trade and business licenses, and review whether required insurance coverages, OSHA safety certifications, and tax arrangements are in place.

5. Using data analytics (tools and analysis) to improve safety

- Computer models are assisting L&I in identifying vacant structures, highlighting buildings in need of inspection, instituting a proactive inspection program for abandoned factories and warehouses, and prioritizing dangerous properties for demolition.

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- These models use unique aerial and street-level imagery in addition to employing innovative approaches to the City’s administrative data sets, including a review of tax records and utility billing.
 - L&I’s GIS team created a model to use the City’s LiDAR data capture to help identify roof holes. The ability to analyze data to pinpoint major property damage not visible from the street should greatly expand L&I’s capacity to proactively identify at-risk properties.
 - The L&I GIS team created an “Alias List” tool to help identify links among properties and property owners where different individual names and companies are being used, so that inspectors can effectively follow up on safety concerns associated with a given owner’s properties.
 - The City’s Law Department is using the Alias List to coordinate court cases against common owners who are behind multiple aliases, instead of having to bring the cases piecemeal, one alias at a time. This will allow the Law Department to try cases more efficiently, and to demonstrate the true scope of the owners’ holdings and harmful practices.

6. Organizational Reform

- The Department was restructured to create a distinct and separate “Building Safety Division” comprised of the units that handle permitting, construction inspections, fire code inspections, and property maintenance inspections.
- The restructuring is a bulwark against “mission-creep” to keep L&I’s core safety mission front and center despite the additional responsibilities of the Department.
- The Deputy Commissioner leading the Division is one of only 700 certified Master Code Officials worldwide and has more than 25 years of building safety experience.
- Mayor Kenney appointed a licensed professional engineer to the position of L&I Commissioner. A proposed executive order would assure that one or both of the City’s highest-ranking building safety officials, L&I Commissioner and Chief Code Official, will always be a qualified engineer.
- A former Deputy State Attorney General, plus a City attorney with more than 30 years of municipal code enforcement experience, have joined L&I to strengthen its enforcement function.
 - Their efforts include creating a research unit to identify absentee property owners, in support of the Department’s efforts to hold owners accountable for maintaining their properties in safe condition.
- For the first time, Philadelphia has a dedicated floodplain manager to increase the city’s resilience to natural disaster by streamlining enforcement of regulatory controls for development on the city’s floodplain.

7. Increased funding for aggressive demolition program

As the result of the city’s aging, “pre-code” housing stock, high rates of poverty, and a climate that features abundant precipitation and freeze-thaw cycles, there are thousands of deteriorating and unstable buildings in Philadelphia that pose a threat to public safety.

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- The FY19 budget permanently increased dedicated funding for public demolitions by \$2 million, to more than \$11 million.
 - The increase is expected to eliminate the backlog of “imminently dangerous” buildings on L&I’s waiting list for demolition by the beginning of 2020.
 - \$11 million represents a 50% increase in the demolition budget since FY13.
 - In the spring of 2013, there were more than 600 buildings categorized as imminently dangerous. Due to L&I’s aggressive demolition program, private demolitions spurred by the construction boom, and aggressive enforcement, the number of imminently dangerous buildings has fallen to below 150 and is steadily dropping.

8. “Project eCLIPSE” investment

- Upon taking office, the Kenney administration conducted a comprehensive review of the ongoing “eCLIPSE” project to develop a replacement for the discontinued legacy software system in use at L&I. The administration recognized that the scope of work in the original eCLIPSE contract fell well short of meeting users’ real-world needs.
- The administration committed to an improved and expanded eCLIPSE project to provide a streamlined “L&I online” experience for users that will allow them to obtain licenses and permits from anywhere with an internet connection.
- Project eCLIPSE now also includes mobile tools for inspectors that will allow real-time recording of inspection results, decreased data-entry errors, and it will maximize the amount of time inspectors spend in the field instead of completing paperwork in the office.
- The project continues to progress, and full rollout is expected in the summer of 2019.

9. Expansion of proactive Fire Code inspection program

In addition to fielding more than 60,000 requests for service annually, L&I inspectors proactively inspect the City’s highest-risk properties to check for compliance with the Fire and Property Maintenance Codes.

- In 2016, 36 party-goers died in a multi-alarm fire at the “Ghost Ship,” an Oakland, CA, warehouse being illegally rented to residential and commercial tenants as artists’ studios, and for underground concerts and events. L&I’s Large Vacant Commercial Industrial Property (LVCIP) program is targeted at the former factories and warehouses in Philadelphia that run the risk of becoming “Ghost Ship” type tragedies.
 - With the help of a mobile-based data collection app created by L&I’s GIS team for this purpose, the inspectors are conducting proactive inspections of suspected LVCIP properties and building a citywide LVCIP database as they enter the results of their inspections. Data gathered through this process will be used to create a model to help L&I track down other similar properties.
- L&I’s additional inspection programs include:
 - Rooming houses purportedly used as drug recovery centers
 - Dance clubs and larger entertainment venues featuring live or recorded music

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- High-rise commercial and residential buildings
 - Auto repair shops
 - Family day care homes
 - Public schools
 - PFD Fire Code Unit referrals

10. Commitment to Transparency

- Third-party evaluation: After a lengthy evaluation process, L&I earned Building Department/Code Enforcement reaccreditation from the International Code Council's International Accreditation Service (IAS). As an accredited agency, L&I is audited annually by the IAS.
 - Accredited agencies meet national best practice standards and demonstrate the capacity to provide enhanced protection of the public's safety and welfare.
 - Philadelphia is the largest city in the nation with an accredited building department.
- Data-sharing: L&I works to provide constantly updated information to researchers and the public. In collaboration with the City's Office of Information and Technology (OIT) and Office of Open Data and Digital Transformation (ODDT), L&I:
 - Made five improved and eight new sets of open L&I data publicly available at opendataphilly.org and openmaps.phila.gov.
 - Released a new application programming interface (API) to improve access to L&I data. Data is updated daily and used by other City applications such as Atlas, supporting a seamless system for data lookup Citywide.
 - Built a Permit Application Tracker for the L&I website to provide permit application status updates. The Tracker averages approximately 800 pageviews per week.
 - Hired a content manager to team with ODDT to overhaul and upgrade L&I's website.

Licenses and Inspections: Performance Measure Snapshot – Fiscal Year Comparison

Performance measures captured as part of the City’s program-based budgeting track demographic characteristics across budget programs, including how the Department is managing and progressing in select areas:

Budget Program	Performance Measures	Unit of Measure	Collection Frequency	FY17	FY18 Target	On Track to Meet FY18?	FY19 Target
Permits and Licensing	Percentage of Residential Plan Reviews performed within 15 days	Percentage	Quarterly	98.6%	99.0%	Yes	99.0%
	Percentage of commercial building, plumbing, electrical, and zoning plan reviews performed within 20 days	Percentage	Quarterly	97.6%	97.0%	Yes	97.0%
	Percentage of customers serviced within 45 minutes	Percentage	Quarterly	N/A	90.0%	Yes	90.0%
	Over-the-counter customers processed within 30 minutes	Percentage	Quarterly	6.83%	7.50%	Yes	80.0%
	Number of building, plumbing, electrical, and zoning permits issued	Number of Permits	Quarterly	54,442	55,000	Yes	55,000
Code Enforcement	Percentage of Nuisance Properties Inspected within 20 days	Percentage	Quarterly	70.0%	80.0%	Yes	85.0%
	Average time from referral to seal	Days	Quarterly	N/A	30	Yes	30
	Median timeframe from “Imminently Dangerous” to Demolition	Days	Quarterly	N/A	145	Yes	145
Demolition	Number of Unsafe Properties	Number of Properties	Quarterly	4,196	Reduction from FY17	Yes	Reduction from FY18
	Number of Program Inspections of Unsafe Properties	Number of Inspections	Quarterly	N/A	10,000	Yes	10,000
	Number of “Imminently Dangerous” Properties	Number of Properties	Quarterly	235	Reduction from FY17	Yes	Reduction from FY18
	Median timeframe from “Imminently Dangerous” to Demolition	Days	Quarterly	TBD	145	Yes	145
	Number of Demolitions performed	Number of Demolitions	Quarterly	524	525	Yes	525
Building Inspections	Average Number of Permits per Inspector	Number of Permits	Quarterly	N/A	375	No	375
	Percentage of High-Risk Occupancies Inspected Annually	Percentage	Quarterly	N/A	N/A	N/A	N/A
Administration	Number of on-the-job injuries	Number of Injuries	Quarterly	N/A	35	Yes	30
	Net Personnel Gain/Loss (Hires vs. Separations)	Number of Employees	Quarterly	15	25	Yes	25

Looking Ahead: Objectives, Goal Setting, and Defining Success

L&I has identified several overarching strategic priority areas of improvement. Within each priority area, the executive team has identified sub-goal areas that, as a department, it would like to address and measure progress:

Strategic Objective #1: Improve Department’s data management and technology system.

Strategic Goals	Defining Success/Success Indicators
Finish eCLIPSE technology project implementation of Phases 3 and 4.	1. The final phases of the project are to be completed by Q2 of FY20 (Oct. 2019). Phase 3 is the Permits & Inspections (P&I) stage and Phase 4 is the Compliance and Enforcement (C&E) stage.
Complete build of data repository.	2. Build out a separate historical data repository that houses all back data of the Department where it is permanently available.
Modernize code enforcement through strategic use of technology.	3. Integrate data and practice, making use of predictive technology and analytics. 4. Design and implement eCLIPSE to streamline certifications of fire alarms and sprinklers, moving towards a more automated alert approach that notifies the Department when properties need to be either updated or repaired. 5. Through data analysis and collaboration with the City’s Law Department and others, undertake high-impact enforcement actions that use available resources effectively.

Strategic Objective #2: Improve customer experience for customers that interface with the Department for assistance, both online and in person.

Strategic Goals	Defining Success/Success Indicators
Reconfigure the concourse at the MSB.	1. Improve customer flow through physical improvements to the concourse and more convenient services. The goal is to service all customers within 30 minutes of arrival, reduce the number of repeat trips, and increase the Department’s net promoter score. 2. Install “Q-Less” appointment scheduling system. 3. Implement enhanced pre-submittal meetings with designers to increase the number of applications that are approved upon first submittal.
Increase the number of online transactions for licensing and permitting to streamline and automate processes.	4. Provide clear and accessible online applications to enable customers to readily self-serve from the convenience of their home or office. The goal is for at least 80% of license and permit transactions to be performed online. The Department seeks to reduce the overall number of help requests and to satisfy those requests within one day of receipt.

<p>Expand language capacities online and community education efforts citywide.</p>	<ol style="list-style-type: none"> 5. Add additional language capacities to customer-facing online tools to match the City’s diverse language base. 6. Create and use graphics and plain language in customer-focused communications to help bridge communication gaps across communities. 7. Update the Department’s website to make it more accessible to individuals who are Limited English Proficient (LEP). 8. Roll out “community-based” code enforcement initiatives in at least three districts.
<p>Facilitate and support intergovernmental collaboration with other government agencies throughout project construction process.</p>	<ol style="list-style-type: none"> 9. Establish pre-construction meetings for major projects, including each essential agency. 10. In the field districts that have a high number of new construction projects, train and assign two building inspectors in each district to work with the Streets Department, and actively patrol jobsites for street and sidewalk closures and general site housekeeping, cleanliness, and security. 11. Design eCLIPSE to serve as a central portal to route applications electronically for interdepartmental review, making approval processes more seamless.

Strategic Objective #3: Prioritize and update the Department’s Human Resources (HR) policies and procedures.

Strategic Goals	Defining Success/Success Indicators
<p>Develop succession planning strategies to address key departures (both civil service and exempt positions). Ideally, have successors in place prior to departure date.</p>	<ol style="list-style-type: none"> 1. Review interdepartmental pending retirements and resignations. 2. Develop a plan for each backfill.
<p>Identify key vacancies—both civil service and exempt—for recruitment and talent development.</p>	<ol style="list-style-type: none"> 3. Develop a talent pipeline. Create a bridge class between operations inspectors and building inspectors. 4. Recruit and train the right talent to meet the Department’s needs and fill skill gaps.
<p>Design and roll out professional development opportunities for new hires and current staff.</p>	<ol style="list-style-type: none"> 5. Develop and execute internal needs assessment on training needs for the Department. Solicit feedback from staff on the most critical areas of need in terms of training (both soft skills and technical). 6. Complete OSHA trainings for Code Enforcement Inspector job specifications. Specific trainings are OSHA 30, OSHA 3500, and Zoning Code requirements. 7. Implement comprehensive trainings on 2018 Building Codes for building inspectors and plans examiners. 8. Create Department-wide Employee Appreciation program that recognizes high performance. 9. Liaise with other City Departments to include L&I new hires in the best orientation and onboarding programs.

Strategic Objective #4: Adopt and implement modern safety codes.

Strategic Goals	Defining Success/Success Indicators
Fully implement 2018 International Building Code series.	<ol style="list-style-type: none"> 1. Update all International Code Council (ICC) certification exams to reflect current codes. 2. Adopt 2021 Fire Code requirements for fire safety during construction. 3. Create program inspection requirement for owners of Large Vacant Commercial Industrial Properties. 4. Create and adopt a Contractor Code of Conduct. 5. Contract with an on-call engineering services provider to supplement and support inspection, training and public education programs.
Review and compare the current Philadelphia Plumbing Code and the International Plumbing Code (IPC), developing local amendments of the IPC to create an updated Philadelphia Plumbing Code.	<ol style="list-style-type: none"> 6. Determine scope and breadth of code amendments upon submittal of recommendations of the Plumbing Advisory Board (PAB). 7. Work with Philadelphia Water Department (PWD) to develop or review PAB amendments to coincide with existing PWD regulations. 8. Draft ordinances adopting the IPC with amendments and submit to the Pennsylvania Department of Labor and Industry for approval. Submit bill to City Council. 9. Contract with the ICC to produce a Philadelphia Plumbing Code for public sale and internal use upon effective date.
Adopt updated Philadelphia Fire Codes developed by L&I and the Philadelphia Fire Department (PFD).	<ol style="list-style-type: none"> 10. Secure passage of bill adopting new Philadelphia Fire Code. 11. Contract with International Code Council to publish the new Philadelphia Fire Code and make it available.
Correct the Property Maintenance Code (PMC).	<ol style="list-style-type: none"> 12. Draft and secure passage of correctly-organized PMC.
Grow capacity of Clean and Seal unit to address vacant properties that are unsafe under PMC because they are open to trespass.	<ol style="list-style-type: none"> 13. Secure budget approval for additional Clean and Seal crew and necessary equipment.
Fully integrate Floodplain Protections into L&I and City practices and procedures.	<ol style="list-style-type: none"> 14. Review and revise current code language to provide consistency and depth in application of floodplain permitting. 15. Complete the Federal Emergency Management Agency (FEMA) Community Assistance Visit review. 16. Apply for and complete the FEMA Community Rating System to achieve insurance discounts for citizens and guide future improvements. 17. Work with Citywide Flood Risk Management Task Force to improve City's mitigation of risk and take full advantage of any related grants.

Strategic Objective #5: Consider the Department’s current and future state needs and make necessary recommendations to provide physical space and equipment improvements that meet specified goals.

Strategic Goals	Defining Success/Success Indicators
Complete district office improvements.	<ol style="list-style-type: none"> 1. Physically relocate people from the Municipal Services Building (MSB) to new buildings, thereby increasing the number of people in district offices. Relocations will occur as eCLIPSE is phased in, as the system’s data will help drive decisions regarding district offices’ physical locations. 2. Open two (2) additional district offices in the city.
Upgrade L&I Permit and License Center in the Municipal Services Building (MSB).	<ol style="list-style-type: none"> 3. Conduct a workflow analysis of MSB concourse operations. Reconfigure space in the short term and complete redesign in the longer term.
Update equipment used in field.	<ol style="list-style-type: none"> 4. Develop and implement a vehicle replacement plan, starting with Clean and Seal Unit equipment replacement. 5. Provide mobile technology to inspectors to capture real-time results and minimize time spent on data entry.

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