



**Internal Audit Department
Code Enforcement Division
Audit A2025-05**

Objectives

The objective of this audit was to perform an assessment of enforcement efforts for nuisance cases. To accomplish this, we:

- Identified and reviewed the top five (5) types of violations and associated data.
- Reviewed if established enforcement processes are in accordance with City Ordinances.
- Evaluated whether imposed penalties are in accordance with established fees and/or fines.
- Identified and documented education and outreach efforts.
- Evaluated budget for staffing levels of the Code Enforcement Department.

Scope

The audit scope covered activity from January 1, 2024, through December 31, 2025, and included:

- Reviewing City of El Paso policies and procedures
- Interviewing Code Enforcement management and staff
- Examining case files and court dispositions for the following top five violations:
 - Brush
 - Illegal Dumping
 - Junked Vehicle
 - Illegal Parking
 - Sidewalk Obstructions

Finding 1

A review of eight (8) manuals identified the following:

- Eight (8) Manuals reflect the El Paso Police (EPPD) name instead of Code Enforcement letterhead.
- Two (2) Manuals do not have an effective date. The remaining six (6) Manuals include effective dates ranging from 2017 to 2023.
- The listed Manuals do not outline specific procedures followed by Code Enforcement regarding Illegal Parking and Sidewalk Obstruction.
 - Sidewalk Obstruction cases are currently addressed under the Brush procedure.
- Code Enforcement is in the process of developing a department-wide Standard Operating Procedures manual.

Recommendation

The Code Enforcement Department should continue developing a department-wide Procedures Manual that:

- Incorporates the new department letterhead,
- Includes an effective date, and
- Documents the procedures for Illegal Parking and Sidewalk Obstruction.

Finding 2

93.08% of cases were resolved within 30 days; however, required timeframes for initial inspections and follow-up visits were not consistently met.

- **Initial Inspections (required within 5 days)**
 - 110 of 130 cases (84.6%) met the requirement
 - 20 cases (15.4%) were completed 6 – 39 days after receipt
- **First Follow-up Visits (required within 7 days; 10 days for Junked Vehicles)**
 - 23 of 65 cases (35.4%) met the requirement
 - 42 cases (64.6%) occurred 8 – 34 days after the initial inspection
- **Second Follow-Up Visits (required within 7 days of first follow-up; 10 days for Junked Vehicles)**
 - 2 of 12 cases (16.7%) met the requirement
 - 10 cases (83.3%) occurred 9 – 34 days after the first follow-up

Recommendation

The Code Enforcement Department should evaluate and strengthen controls to improve compliance with required 5-day initial visit and 7-day (10-day for Junked Vehicle) follow-up benchmarks. This may include implementing workload monitoring tools, adjusting case assignment practices, or leveraging automated alerts to ensure timely inspections.

While the department is meeting its overall 30-day case completion KPI, improving interim milestone performance will support more effective enforcement, reduce backlogs, and improve service responsiveness.

Conclusion

Code Enforcement met the audit objectives in the following areas:

- Documenting procedures manuals for 3 of the 5 top violations (Brush, Junked Vehicle, and Illegal Dumping) in accordance with City Ordinances.
- Ensuring that 80% of cases are resolved within 30 days.
- Ensuring imposed penalties and costs are in accordance with established fees and/or fines.
- Establishing education and outreach efforts.
- Evaluating department's budget to ensure current needs and future department growth.

Conclusion (Cont.)

Code Enforcement did not meet the audit objectives in the following areas:

- Developing a department-wide Standard Operating Procedures manual.
- Ensuring that initial and follow-up inspections are completed within the requirements listed on the City Ordinances and Code's Procedures Manuals.

Management Response

Finding 1

The new Code Enforcement Department was created on September 1, 2025. We previously reported to the El Paso Police Department. The development of a department-wide Standard Operating Procedures Manual is a top priority. We have a cross-functional team working on this manual, with a target implementation date of August 31, 2026. The manual will include all code-nuisance enforcement processes, including our new enforcement divisions.

Management Response (Cont.)

Finding 2

Meeting the department's process timelines is highly important for all cases. When we did not follow our outlined timelines, these instances were attributed to staff vacancies and to supervisors not tracking cases. To better address these situations, we are making sure that we fill all current vacancies. We are also recruiting a Quality Assurance and Training Specialist to track case processing, identify areas of improvement, and train manager, supervisors, and staff. The objective will be to improve all current processes and identify deficiencies department-wide.

Requested Action

To accept the results of the Code Enforcement Division Audit and forward the Audit Report to City Council for action.