

Property Accountability & Occupancy Compliance Initiative

Council Policy Brief

City of Oneida, New York

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July 2026

Executive Summary

The City of Oneida continues to face significant challenges related to neglected rental properties, absentee ownership, chronic code violations, vacant buildings, incomplete ownership and occupancy information, and limited capacity for proactive inspection and enforcement.

The proposed Property Accountability & Occupancy Compliance Initiative is intended to establish a coordinated, phased framework for residential rental registration, improvement of the existing Vacant Building Registry, future commercial property registration, occupancy coordination, centralized property tracking, and risk-based inspection and enforcement.

The City Attorney's review identified no general legal impediment to the principal registration and property-accountability concepts outlined in the original framework. The review also identified several areas requiring further policy development, legal drafting, objective standards, due-process protections, cost analysis, staffing review, and administrative planning before implementation may occur.

Staff recommends beginning with an administrative review of the existing Vacant Building Registry and establishing residential rental registration as the first major new legislative component. Commercial registration, advanced enforcement tools, public compliance recognition, and other more complex elements should be considered in later phases after sufficient staffing, technology, legal authority, and administrative capacity are established.

Successful implementation will require additional Code Enforcement capacity, administrative support, appropriate technology, legal coordination, and a documented cost analysis. Any registration fee should be based on the actual cost of operating the program and should not be treated as a general revenue source.

The Common Council is not being asked at this time to adopt a final registration program, establish fees, approve staffing, or authorize implementation. Council is being asked to provide general policy direction regarding continued phased development of the initiative.

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1. Purpose and Existing Need

The City of Oneida continues to face ongoing challenges associated with chronic nuisance properties, absentee ownership, unsafe or deteriorating rental housing, unresolved code violations, vacant buildings, and property ownership structures that can make accountability and enforcement more difficult.

Many landlords, property owners, and business operators maintain their properties responsibly and respond appropriately when concerns arise. However, a smaller number of properties generate a disproportionate amount of code enforcement activity, public complaints, neighborhood impacts, and demands on City staff and public safety resources.

The City's current property compliance system is largely reactive. Staff must prioritize active complaints, emergency conditions, court matters, unsafe structures, and immediate enforcement needs. At the same time, the City continues to manage an existing residential inspection backlog while operating with limited code enforcement and administrative staffing.

The City also lacks a fully integrated property accountability system capable of consistently tracking:

- rental property ownership and responsible-party information;
- local ownership or management contacts;
- inspection and compliance history;
- recurring nuisance or enforcement activity;
- vacant building status;
- commercial occupancy changes;
- related ownership entities; and
- coordinated activity among Codes, Planning, Fire, and other City departments.

The proposed Property Accountability & Occupancy Compliance Initiative is intended to create a more coordinated, proactive, and sustainable framework for property registration, inspection coordination, ownership accountability, occupancy compliance, and risk-based enforcement.

The initiative is not intended to treat all property owners as enforcement concerns. Its purpose is to improve accountability, support responsible ownership, strengthen public safety, improve administrative coordination, and allow City resources to be directed more effectively toward properties with recurring or significant compliance concerns.

The original framework recognizes that implementation would create substantial new registration, inspection, administrative, technology, and enforcement responsibilities and therefore recommends a phased approach aligned with available staffing and operational capacity.

2. Existing Operational Conditions

The City currently administers residential housing inspections, property maintenance enforcement, complaint investigation, unsafe building coordination, permit and occupancy-related review, court support, and other code compliance functions through the Department of Planning, Development and Codes.

Current departmental staffing includes:

- two full-time Code Enforcement Officers;
- one clerical support position; and
- administrative oversight and coordination by the Director of Planning, Development and Codes.

The Department is responsible for a broad and growing range of duties, including residential inspections, property maintenance enforcement, complaint response, unsafe building cases, zoning and occupancy coordination, court preparation, nuisance property follow-up, public assistance, and coordination with other City departments.

The City currently conducts routine fire-safety and property-maintenance inspections of multiple dwellings on a three-year cycle. This represents the maximum inspection interval permitted under State regulations and the minimum required inspection frequency established by the City's current code enforcement program. State requirements allow municipalities to establish more frequent inspection intervals based on local conditions.

While the three-year cycle provides a baseline for routine inspections, it does not necessarily provide sufficient oversight for properties experiencing recurring code violations, significant maintenance deficiencies, unsafe conditions, repeated nuisance activity, or other documented indicators of elevated risk. A future property accountability system could maintain the three-year routine inspection cycle for consistently compliant properties while allowing more frequent inspections and enhanced monitoring for properties with significant or recurring compliance concerns.

The City currently has an active residential inspection backlog estimated at approximately six months. This estimate does not include the separate commercial fire-safety and property-maintenance inspection workload and backlog administered through the Fire Department. As a result, both residential and commercial inspection responsibilities are operating under significant workload pressures.

Current staffing levels require City personnel to prioritize immediate health and safety concerns, active complaints, emergency conditions, court matters, unsafe structures, and significant enforcement cases before broader proactive inspection and compliance work can occur. This contributes to an enforcement system that remains largely reactive rather than preventive.

Limited staffing and administrative capacity currently constrain the City's ability to consistently:

- maintain required inspection schedules;
- increase inspection frequency for documented high-risk properties;
- identify and monitor chronic problem properties;
- track repeat violations across multiple properties or related ownership entities;
- maintain current ownership and responsible-party information;
- coordinate recurring nuisance and compliance concerns;
- expand public outreach and property-owner assistance; and
- implement new registration, monitoring, or enforcement programs.

The City also does not currently have a fully centralized system that integrates ownership information, rental status, inspection history, vacant building status, complaints, violations, occupancy information, and interdepartmental activity into one coordinated property record.

Implementation of a citywide property accountability initiative would create significant additional responsibilities, including registration processing, ownership verification, database management, fee collection, renewal notices, inspection coordination, compliance tracking, public inquiries, enforcement follow-up, software administration, and records management. The original framework recognizes that these responsibilities would exceed current operational capacity without phased implementation and additional staffing support.

These operational conditions demonstrate that meaningful implementation will require additional Code Enforcement and administrative capacity. Recommended staffing considerations are addressed in Section 6.

3. Proposed Long-Term Program Framework

The Property Accountability & Occupancy Compliance Initiative is intended to create a coordinated, phased system for improving ownership accountability, inspection coordination, occupancy compliance, property tracking, and enforcement prioritization throughout the City.

The initiative is not proposed as a single program to be implemented all at once. Instead, it is structured as a series of related components that may be developed and implemented in phases based on Council policy direction, legal review, staffing capacity, available funding, technology needs, and operational readiness.

The proposed long-term framework includes the following major components:

A. Residential Rental Registration

Development of a citywide residential rental registration system intended to establish a complete and current inventory of rental properties and dwelling units within the City.

The registration process may include:

- property ownership information;
- responsible-party and local-contact information;
- ownership entity information;
- number and type of rental units;
- inspection and compliance status;
- current contact information for notices and emergency coordination; and
- periodic renewal requirements.

The purpose of the registry would be to improve accountability, support inspection scheduling, provide reliable contact information, and reduce delays caused by outdated, incomplete, or difficult-to-identify ownership records.

Any future residential registration program would require separate legislation establishing applicability, exemptions, registration requirements, enforcement procedures, due-process protections, and authority for related fees.

B. Existing Vacant Building Registry Coordination and Improvement

The City currently maintains a vacant building registry under existing City Code. The proposed initiative would include an operational review of the current registry to identify opportunities to improve:

- ownership and responsible-party information;
- property monitoring;

- maintenance compliance;
- inspection coordination;
- required reporting;
- fee collection;
- enforcement follow-up;
- recordkeeping; and
- coordination with other City departments.

City Attorney review indicated that some improvements to the existing vacant building program may be accomplished administratively, although any specific proposed changes should be reviewed to determine whether amendments to City Code are necessary.

C. Commercial Property Registration

A future commercial property registration system may be considered to improve ownership transparency, emergency contact information, occupancy tracking, and communication with responsible parties for commercial and mixed-use properties.

The intent would be to create a reliable property and contact inventory rather than establish an unnecessary barrier to business activity.

Potential registration information may include:

- property ownership;
- responsible-party information;
- emergency contacts;
- property management contacts;
- commercial tenant or occupancy information;
- mixed-use occupancy information; and
- changes in ownership or management.

City Attorney review identified no apparent legal barrier to the general concept of commercial property registration.

D. Commercial Change-of-Occupancy and Tenancy Coordination

The initiative may also include improved administrative review when commercial spaces change tenants, business operators, uses, or occupancy classifications.

The purpose would be to improve coordination among Planning, Codes, Fire, and other appropriate departments and reduce the likelihood that spaces are repeatedly occupied without addressing existing violations, unsafe conditions, zoning concerns, or code requirements.

Not every change in tenant would necessarily require the same level of review. A future process should distinguish between:

- a new tenant continuing the same lawful use;
- a change in business activity;
- a change of use;
- a change in occupancy classification;
- significant alterations to the property; and
- circumstances that may trigger zoning, site-plan, fire-safety, building-code, parking, signage, or other review requirements.

City Attorney review noted that changes in use and occupancy are governed in part by State Code and may trigger different zoning, site-plan, fire-safety, parking, signage, and related requirements.

E. Centralized Property Accountability and Data Management

The City should evaluate the development or expansion of a centralized property information system capable of coordinating:

- ownership and responsible-party information;
- rental registration status;
- vacant building status;
- commercial occupancy information;
- inspection history;
- complaint history;
- open violations;
- enforcement activity;
- nuisance-related information;
- fees and renewal status; and
- interdepartmental coordination.

A centralized system would improve consistency, reduce duplication, support better records management, and help staff identify recurring compliance concerns across properties and ownership entities.

The original framework identified software modernization and centralized tracking as necessary components of long-term implementation.

F. Risk-Based Inspection and Enforcement Prioritization

The initiative would support a risk-based approach to inspection scheduling and enforcement.

Under this model, consistently compliant properties could remain on the routine inspection cycle, while properties with documented recurring or significant concerns could receive increased inspection frequency, additional monitoring, or prioritized enforcement attention.

Risk factors may include:

- recurring code violations;
- repeated failure to correct violations;
- significant property-maintenance deficiencies;
- unsafe conditions;
- repeated nuisance activity;
- unresolved Orders to Remedy;
- unregistered rental activity;
- vacant building concerns;
- repeated missed inspections;
- false or incomplete registration information; or
- other objective indicators established by future law or administrative policy.

Any classification or prioritization system should rely on objective, consistently applied criteria. City Attorney review specifically cautioned that subjective public grading systems may create legal concerns and should not be implemented without clear, data-driven standards and appropriate due-process protections.

G. Phased Implementation

The initiative should be implemented gradually rather than through immediate citywide expansion of all proposed components.

A phased approach would allow the City to:

- evaluate existing systems;
- establish clear legal authority;
- develop administrative procedures;
- determine staffing needs;
- evaluate software and technology;
- establish defensible fee structures;
- conduct public outreach;
- address existing inspection backlogs;
- prioritize higher-risk properties; and
- expand services as staffing and resources become available.

The original framework and City Attorney review both support phased implementation as necessary for operational sustainability and consistent enforcement.

4. Summary of City Attorney Review

The City Attorney reviewed the original Property Accountability & Occupancy Compliance Initiative as a policy framework and generally found that the major registration and accountability concepts may be legally supportable. However, many of the proposed enforcement, classification, fee, and corrective-action provisions require additional policy development and more specific legal drafting before they could be implemented.

The legal review supports continued development of the initiative but also confirms that the current framework is not a completed local law or an implementation-ready program. Additional decisions are required regarding program scope, administrative responsibility, objective enforcement standards, notice and appeal procedures, staffing, fees, and implementation sequencing.

The principal legal findings are summarized below.

A. Residential Rental Registration

The City Attorney advised that the City may establish a mandatory residential rental registration program and may require property owners to provide ownership information, responsible-party information, local contact information, and other information necessary to administer the program.

The City may also establish consequences for failure to register, provided those remedies are clearly authorized by local law and include appropriate procedures and protections.

Any future law would need to define:

- which rental properties and dwelling units are subject to registration;
- whether exemptions apply;
- required ownership and contact information;
- registration and renewal procedures;
- inspection and compliance requirements;
- enforcement procedures;
- notice and opportunity to correct;
- penalties and remedies; and
- appeal rights.

B. Ownership Disclosure and Responsible-Party Requirements

The proposed requirement for disclosure of ownership entities, managing parties, registered agents, local contacts, and related ownership information was generally found to be acceptable.

More precise definitions may still be required for terms such as:

- owner;
- responsible party;
- local contact;
- affiliated entity;
- common ownership;
- management responsibility; and
- control.

Clear definitions would help ensure consistent administration and reduce the potential for confusion or overreach.

C. Existing Vacant Building Registry

The City Attorney indicated that some proposed improvements to the existing Vacant Building Registry may be implemented through administrative action without immediate legislative amendment.

However, each proposed operational change should be reviewed individually to determine whether it can be addressed administratively or requires an amendment to City Code.

This provides an opportunity for the City to begin evaluating the current registry while the broader residential and commercial registration programs are still being developed.

D. Commercial Property Registration

The City Attorney identified no apparent legal barrier to the general concept of commercial property registration.

The program should be structured as an ownership, responsible-party, emergency-contact, occupancy-accountability, and compliance-coordination system rather than as an unnecessary obstacle to business activity.

The scope, exemptions, registration requirements, administrative responsibility, and enforcement procedures would still require further development.

E. Change of Commercial Tenancy, Use, or Occupancy

The legal review emphasized the need to distinguish between:

- a simple change in commercial tenant;
- a continuation of the same lawful use;
- a change in business activity;
- a change in use; and
- a change in occupancy classification.

Changes in use or occupancy may trigger State Building Code, Fire Code, zoning, parking, signage, site-plan, or other regulatory requirements. A future City process should be coordinated with these existing requirements and should avoid imposing unnecessary review when a lawful use continues without a material change.

F. Compliance Classifications and Public Ratings

The original framework proposed a three-level compliance classification system. The City Attorney advised that any grading, rating, or classification system must be based on clear, objective, and consistently applied data.

A system involving subjective judgments could expose the City to claims of inconsistent treatment, discrimination, harassment, or unfair enforcement.

For that reason, any future risk-based system should focus initially on objective inspection and enforcement criteria rather than public star ratings.

Potential objective factors may include:

- number and severity of violations;
- repeated failure to correct;
- missed inspections;
- documented unsafe conditions;
- recurring nuisance activity;
- unresolved enforcement orders; and
- compliance history.

Any public classification system would also require clear notice, correction procedures, appeal rights, and standards for changing a property's status.

G. Public Registry and Information Disclosure

The City Attorney advised that residential, commercial, and vacant-property registration records would generally be subject to the New York State Freedom of Information Law.

The use of a centralized software or property-record system does not by itself change whether particular information is subject to disclosure.

The City would still need to determine what information should be displayed publicly and what information should remain available only through normal records-request procedures.

H. Enforcement, Suspension, Revocation, and Corrective Action

The original framework identified several potential enforcement tools, including:

- notices of violation;
- corrective-action plans;
- civil penalties;
- suspension or revocation;
- denial or nonrenewal;
- occupancy restrictions;
- court enforcement;
- cost recovery; and
- other available remedies.

The City Attorney advised that these concepts require more specific development before legal sufficiency can be evaluated. Future legislation would need to establish clear standards for:

- notice;
- opportunity to correct;
- compliance periods;
- hearings;
- appeals;
- emergency action;
- reinstatement;
- administrative review; and
- judicial review.

Corrective-action requirements should be connected to documented violations, objective conditions, clear timelines, and measurable compliance requirements.

I. Chronic Noncompliance and Related Ownership Entities

The concept of identifying recurring noncompliance across multiple commonly owned or controlled properties may be legally supportable, but it must be carefully defined.

Future legislation should rely on objective evidence of common ownership, management, or control and should avoid assigning responsibility solely because entities share limited business or contact information.

The City would also need clear standards describing what level or pattern of noncompliance justifies enhanced review or enforcement.

J. Tenant Relocation and Owner-Caused Unsafe Conditions

The City Attorney recommended caution regarding tenant-relocation requirements and other City involvement in the landlord-tenant relationship.

Responsibility for unsafe conditions may be disputed, and some obligations may already be addressed through lease agreements or other areas of State law. Conditions may also result from tenant actions rather than owner neglect.

For these reasons, tenant-relocation requirements should not be treated as an initial implementation component and would require additional legal analysis before further consideration.

K. Fees and Cost Recovery

The City Attorney advised that registration fees may be legally permissible when they are reasonably related to the City's actual cost of administering the program.

The authority to charge registration fees should generally be established in local law, while the specific fee amounts may be adopted and adjusted by Common Council resolution. Registration fees should remain separate from existing inspection and reinspection fees.

The fee structure should be supported by a documented cost analysis that considers:

- administrative staffing;
- registration processing;
- software;
- payment processing;
- records management;
- notices and mailings;
- inspection coordination;
- compliance monitoring;
- enforcement support;
- legal support; and
- other direct program costs.

The program should therefore be presented as a cost-recovery and operational-support system rather than as a general revenue source.

L. Phased Implementation

The City Attorney supported the phased implementation approach identified in the original framework and recognized that gradual implementation is important for operational sustainability and consistent enforcement.

A phased approach would allow the City to:

- improve existing systems first;
- identify and address staffing needs;
- establish objective standards;

- develop necessary legislation;
- create administrative procedures;
- complete a defensible cost analysis;
- implement appropriate software;
- conduct public outreach; and
- expand the program as operational capacity becomes available.

Overall Legal Conclusion

The City Attorney's review supports continued policy and operational development of the initiative. The core concepts of residential registration, ownership disclosure, commercial registration, centralized property tracking, reasonable cost-based fees, and phased implementation are generally capable of further development.

However, the existing framework should not be treated as a completed legislative proposal. Detailed local laws, administrative procedures, due-process protections, objective enforcement standards, fee analysis, staffing plans, and implementation procedures must be developed before any major new program becomes operational.

5. Recommended Phased Implementation Approach

The Property Accountability & Occupancy Compliance Initiative should be developed and implemented in phases rather than as one comprehensive program introduced all at once.

A phased approach would allow the City to address the most immediate operational needs first while providing sufficient time for legal drafting, staffing, cost analysis, software development, administrative preparation, and public outreach. It would also reduce the risk of creating new obligations that existing staff cannot reasonably administer.

The recommended sequence is outlined below.

Phase 1 — Existing System Review and Administrative Preparation

The City should begin by reviewing and strengthening systems that already exist, particularly the Vacant Building Registry and current residential inspection and property-tracking processes.

Initial work should include:

- reviewing the current Vacant Building Registry for completeness and consistency;
- evaluating ownership, responsible-party, and local-contact information;
- reviewing existing reporting, inspection, fee, and enforcement procedures;
- identifying administrative improvements that may be implemented under current law;
- determining which changes may require amendments to City Code;
- reviewing existing residential rental and commercial property records;
- identifying gaps in property ownership, occupancy, and inspection information;
- evaluating current software and data-management capabilities; and
- identifying staffing, technology, and administrative needs.

This phase may begin before adoption of a new registration law because it is primarily focused on improving existing operations and preparing the City for future program development.

Phase 2 — Residential Rental Registration Development

Residential rental registration is recommended as the first major new legislative component of the initiative.

Development of this phase should include:

- defining which rental properties and dwelling units would be subject to registration;
- identifying appropriate exemptions;
- establishing owner, responsible-party, and local-contact requirements;
- determining registration and renewal procedures;
- coordinating registration with the City's existing inspection program;

- developing objective criteria for increased inspection frequency and enhanced monitoring;
- establishing notice, enforcement, and appeal procedures;
- developing administrative forms and internal workflows;
- evaluating software and public-access requirements;
- preparing a documented program cost analysis; and
- developing a proposed fee structure based on actual administrative and operational costs.

The Department should provide the operational requirements and program objectives, while the City Attorney should prepare or lead the drafting of the necessary local law and legal procedures.

Implementation should not begin until the City has established sufficient staffing, administrative support, legal authority, software capability, and funding.

Phase 3 — Initial Residential Registration and Risk-Based Implementation

Following adoption of the necessary legislation and completion of administrative preparation, residential registration should be introduced through a controlled rollout.

Initial implementation may include:

- public education and property-owner outreach;
- registration of rental properties;
- verification of ownership and responsible-party information;
- development of a complete rental-property inventory;
- coordination with the existing three-year inspection cycle;
- prioritization of properties with documented health, safety, maintenance, nuisance, or recurring compliance concerns;
- integration of existing inspection-backlog properties; and
- evaluation of program workload and staffing capacity.

The City should avoid attempting to inspect every registered property immediately. Initial inspection and enforcement activity should focus on properties with documented concerns while routine inspections continue according to the established inspection cycle.

Phase 4 — Commercial Property Registration and Occupancy Coordination

After the residential program is operational and the City has evaluated its staffing and administrative capacity, the City may consider development of a commercial property registration and occupancy-coordination program.

This phase may include:

- commercial property ownership and responsible-party information;
- emergency and property-management contacts;
- commercial tenant and occupancy information;
- mixed-use property coordination;
- procedures for reporting changes in ownership, management, or occupancy;
- improved coordination among Planning, Codes, Fire, and other departments; and
- administrative review of commercial occupancy transitions where applicable.

Any commercial program should be designed to improve communication, public safety, and compliance coordination without creating unnecessary barriers to lawful business activity.

Phase 5 — Advanced Accountability and Enforcement Tools

More complex program elements should be considered only after the City has established reliable registration systems, sufficient staffing, objective compliance data, and effective administrative procedures.

Potential future components may include:

- enhanced corrective-action requirements;
- chronic noncompliance designations;
- expanded cost-recovery mechanisms;
- cross-portfolio review involving commonly owned or controlled properties;
- additional public transparency measures;
- compliance classifications;
- expanded enforcement remedies; and
- tenant-protection measures requiring additional legal analysis.

These components would require further policy development, objective standards, legal review, due-process protections, and consideration of administrative capacity before implementation.

Ongoing Evaluation

Each phase should be reviewed before the City advances to the next stage.

Evaluation should consider:

- registration participation;
- inspection backlog;
- number and severity of violations;
- staff workload;
- administrative processing time;
- enforcement activity;
- program revenue and actual costs;
- software performance;

- public and property-owner feedback;
- staffing capacity; and
- measurable effects on property compliance and neighborhood conditions.

The timing of each phase should be based on operational readiness and available resources rather than a predetermined implementation deadline.

This phased structure allows the City to begin meaningful work while avoiding premature implementation of a complex citywide program without the staffing, legal framework, technology, and funding necessary for long-term success.

6. Staffing, Technology, and Financial Capacity

Successful implementation of the Property Accountability & Occupancy Compliance Initiative will require sufficient staffing, administrative support, technology, legal coordination, and funding.

The initiative should not be viewed as a simple revenue-generation program. Any registration or program fees must be reasonably related to the City's actual costs of administration, inspection coordination, recordkeeping, compliance monitoring, enforcement support, software, public communication, and other program responsibilities.

The City should avoid adopting a program that creates substantial new legal and administrative obligations without first establishing the capacity necessary to operate it effectively, consistently, and fairly.

A. Code Enforcement Staffing

The City's Code Enforcement Department is responsible for substantially more than routine housing inspections and property-maintenance enforcement.

As outlined under Chapter 33 of the City Code, Code Enforcement staff are responsible for the City's residential and commercial building-permit process from application through final approval. This includes reviewing permit applications and construction plans, issuing permits, conducting required inspections during construction, verifying completed work, and issuing certificates of occupancy or compliance when applicable.

In addition to building permits and construction inspections, existing responsibilities include:

- investigating complaints involving buildings, properties, construction activity, and code violations;
- conducting residential housing and property-maintenance inspections;
- performing reinspection's and verifying required corrective work;
- addressing unsafe buildings, structures, equipment, and conditions;
- administering property-maintenance enforcement;
- preparing and issuing Orders to Remedy and other enforcement notices;
- issuing stop-work orders when work is unsafe, unauthorized, or not compliant;
- coordinating court-related enforcement and supporting prosecutions;
- maintaining permit, inspection, complaint, enforcement, and property records;
- collecting and documenting applicable permit and inspection fees;
- providing technical assistance to residents, property owners, contractors, developers, and businesses;
- coordinating with Planning, Fire, Engineering, Public Works, the City Attorney, and other City departments; and
- carrying out other responsibilities required under City Code and State law.

These responsibilities apply to residential and commercial construction throughout the City and continue regardless of whether the proposed Property Accountability & Occupancy Compliance Initiative moves forward.

To support effective implementation, reduce existing inspection backlogs, expand proactive enforcement capacity, and maintain timely permit and construction-inspection services, the City should consider the addition of up to two full-time Code Enforcement Officers.

At least one additional officer should be assigned an alternative schedule, potentially Tuesday through Saturday from approximately 10:00 a.m. to 6:00 p.m. This schedule would provide increased late-afternoon, evening, and weekend coverage and improve opportunities to reach property owners and occupants outside traditional business hours.

The scheduling of additional positions should be structured to expand overall departmental coverage while maintaining sufficient weekday capacity for permit review, construction inspections, housing inspections, court preparation, enforcement follow-up, interdepartmental coordination, and public assistance.

While one additional officer may provide the minimum staffing capacity necessary to begin phased implementation, two additional officers would provide a more sustainable staffing model for reducing existing backlogs, increasing inspection frequency for higher-risk properties, maintaining permit and construction-inspection services, and expanding coverage without reducing existing City services.

B. Administrative and Clerical Support

A citywide registration system would create a significant administrative workload separate from field inspection duties.

Administrative responsibilities may include:

- processing registration applications;
- reviewing submissions for completeness;
- maintaining ownership and contact information;
- processing registration and renewal fees;
- issuing notices and correspondence;
- tracking registration status;
- coordinating inspection schedules;
- responding to public inquiries;
- maintaining records;
- updating databases;
- processing ownership and occupancy changes;
- coordinating public information;
- supporting enforcement documentation; and

- assisting with program reporting.

The City should consider the addition of a full-time clerical or administrative position to support Planning, Development and Code Enforcement operations.

This position would be necessary to prevent registration administration from being absorbed entirely by existing staff or reducing the Department's capacity to perform current responsibilities.

C. Planning and Development Capacity

The Director of Planning, Development and Codes currently oversees a broad range of responsibilities beyond Code Enforcement, including:

- planning and zoning administration;
- PCZBA coordination;
- economic development;
- grant development and administration;
- Downtown Revitalization Initiative projects;
- comprehensive planning;
- major development projects;
- departmental management;
- policy development; and
- interdepartmental coordination.

Development and implementation of this initiative will require substantial project management, policy development, public outreach, interdepartmental coordination, data analysis, and administrative oversight.

The City should therefore continue to evaluate the need for a full-time Development Specialist to support Planning and Development operations and ensure that implementation of the property-accountability initiative does not delay or reduce the City's capacity to advance other development, planning, grant, and revitalization priorities.

D. Technology and Data Management

Effective implementation will require a reliable and centralized technology system capable of supporting registration, inspection coordination, compliance tracking, records management, and interdepartmental access.

The City should evaluate whether existing software can be expanded or whether additional software or system upgrades are necessary.

Technology needs may include:

- online registration applications;
- electronic fee payment;
- ownership and responsible-party records;
- automated renewal notices;
- inspection scheduling;
- inspection history;
- violation and corrective-action tracking;
- document storage;
- vacant building information;
- commercial occupancy information;
- reporting and workload analysis;
- public information functions;
- mobile access for field staff; and
- coordination among Planning, Codes, Fire, Finance, and other appropriate departments.

The original initiative identified centralized property tracking and software modernization as essential to long-term administration and operational sustainability.

Technology should be selected based on operational need, usability, records-management requirements, compatibility with existing City systems, implementation cost, ongoing maintenance, and staff capacity.

E. Program Cost Analysis

Before establishing final registration fees, the City should complete a documented cost analysis.

The analysis should consider both startup and recurring costs, including:

- Code Enforcement staffing;
- administrative staffing;
- Planning and Development support;
- legal review and legislative drafting;
- software licensing and implementation;
- equipment and technology;
- payment processing;
- printing and mailing;
- public outreach and education;
- records management;
- inspection coordination;
- enforcement support;
- training;
- reporting; and
- other direct program expenses.

The cost analysis should also distinguish registration fees from existing inspection and reinspection fees.

Registration fees should support the administrative and operational structure of the registration and accountability program, while inspection fees should continue to support the direct costs associated with inspections, reinspection's, missed appointments, and related field activity.

F. Funding and Implementation Readiness

The City should not begin full program implementation until sufficient funding and staffing are authorized.

Before implementation, the City should confirm that:

- required legislation has been adopted;
- administrative procedures have been developed;
- necessary staff positions have been funded;
- software and technology are operational;
- registration forms and notices are complete;
- fee structures are supported by cost analysis;
- records-management procedures are established;
- enforcement and appeal procedures are in place;
- staff have received appropriate training; and
- public outreach has occurred.

Implementation should proceed only at a pace supported by available staffing, technology, legal authority, and financial resources.

This approach will help ensure that the City establishes a functional and sustainable program rather than creating new requirements that cannot be administered consistently.

7. Recommended Council Policy Direction

The Property Accountability & Occupancy Compliance Initiative is intended to provide a long-term framework for improving property accountability, inspection coordination, ownership information, occupancy compliance, and enforcement capacity throughout the City.

At this stage, the initiative is not being presented as a completed local law or an implementation-ready program. Additional work is still required to define program scope, develop legislation, complete cost and staffing analyses, establish administrative procedures, evaluate technology needs, and determine an appropriate implementation schedule.

The Common Council is therefore being asked to provide general policy direction regarding continued development of the initiative and the recommended phased approach.

No final program adoption, fee authorization, staffing approval, or implementation action is requested at this time.

Staff recommends that the Common Council support the following direction:

1. **Continue development of the Property Accountability & Occupancy Compliance Initiative as a phased City priority.**
2. **Begin with an administrative review of the existing Vacant Building Registry** to identify opportunities to improve ownership records, responsible-party information, monitoring, reporting, fee collection, inspection coordination, enforcement follow-up, and interdepartmental communication.
3. **Establish residential rental registration as the first major new legislative component** to be developed under the initiative.
4. **Direct further evaluation of program staffing and operational needs**, including additional Code Enforcement and administrative capacity necessary to reduce current backlogs, maintain existing services, and support future registration and compliance responsibilities.
5. **Complete a documented program cost analysis** before establishing any final registration fee structure.
6. **Evaluate technology and centralized property-tracking options** capable of supporting registration, inspections, ownership information, compliance history, records management, and interdepartmental coordination.
7. **Coordinate future legislative development through the City Manager and City Attorney**, with City departments providing operational requirements, program objectives, staffing information, and implementation needs.
8. **Return to the Common Council with more detailed proposals** before implementation of any new registration program, fee structure, enforcement process, staffing expansion, or major program component.

The recommended direction would allow staff and legal counsel to continue developing the initiative without committing the City to immediate implementation or adoption of every concept contained in the original framework.

It would also allow future decisions to be made individually as the legal, operational, financial, staffing, and administrative requirements of each program component are more fully developed.

Recommended Initial Priority

The recommended initial sequence is:

First: Review and improve administration of the existing Vacant Building Registry.

Second: Develop a residential rental registration framework, including scope, exemptions, registration requirements, ownership and local-contact information, inspection coordination, staffing needs, cost analysis, fees, enforcement procedures, and appeal protections.

Third: Evaluate commercial property registration and commercial occupancy coordination after the City has established sufficient staffing, administrative systems, technology, and experience with the initial phases.

This approach provides clear direction while avoiding premature implementation of a complex citywide program without the staffing, legal framework, technology, and funding necessary for long-term success.

8. Conclusion

During the past year, one of the concerns heard most consistently from residents, City officials, staff, and community stakeholders has been the effect that neglected rental properties, absentee ownership, chronic code violations, and poor property accountability can have on neighborhoods and the overall quality of life in Oneida.

These concerns are not new. The City's Comprehensive Plan identified housing rehabilitation, neighborhood stabilization, improved code enforcement, and stronger action involving absentee and irresponsible landlords as important community priorities. Recent community and stakeholder discussions associated with the current Comprehensive Plan process have continued to identify many of these same concerns, including the relationship between deteriorating properties, neighborhood instability, recurring public-safety calls, and the City's limited ability to maintain a complete and current understanding of property ownership and occupancy. A well-designed Property Accountability & Occupancy Compliance Initiative has the potential to make a meaningful and lasting difference. It could give the City better information, improve communication with property owners, support more effective inspections, strengthen accountability, direct resources toward properties with the most serious concerns, and help prevent conditions from continuing until they become neighborhood-wide problems.

This initiative is not intended to punish responsible landlords or create unnecessary barriers for property owners who maintain safe, compliant housing. Responsible owners are an essential part of Oneida's housing system and should benefit from a process that is clear, consistent, predictable, and focused primarily on documented noncompliance. Over time, the City may also consider objective ways to recognize properties and owners that maintain strong compliance records, provided any public recognition system is based on clear standards and appropriate legal safeguards. Such recognition could help responsible landlords distinguish themselves while encouraging continued investment and property maintenance.

The most important outcome, however, is broader than any registry, fee, inspection schedule, or enforcement tool. It is the opportunity to improve housing conditions, strengthen neighborhoods, support responsible ownership, protect residents, and improve the appearance, safety, and long-term stability of the City.

This initiative will require time, careful legal development, appropriate staffing, technology, funding, and sustained support. It will not be a quick or simple solution. However, if developed responsibly and implemented in phases, it could become one of the most significant long-term neighborhood and housing initiatives undertaken by the City in many years.

The Common Council has an opportunity to help shape that effort from the beginning and establish a clear policy direction focused on accountability, fairness, public safety, and neighborhood improvement. With the appropriate resources and continued collaboration among Council, the City Manager, City staff, legal counsel, property owners, tenants, and community partners, this initiative has the potential to produce visible and lasting improvements throughout Oneida.

