

2019-111 AUDIT SCOPE AND OBJECTIVES
Department of Housing and Community Development—
Mobilehome Park Inspections

The audit by the California State Auditor will provide independently developed and verified information related to the Department of Housing and Community Development (HCD) and the inspections it conducts as mandated by the Mobilehome Park Act (MPA) and Mobilehome Park Maintenance Inspection Program (MPM program). The audit's scope will include, but not be limited to, the following activities:

1. Review and evaluate the laws, rules, and regulations significant to the audit objectives.
2. For the last three years, review HCD's approach to inspections by doing the following:
 - (a) Identify the number of parks inspected and the frequency with which HCD inspects parks under the MPA complaint process and the MPM program, and determine whether HCD is meeting any applicable goals and requirements.
 - (b) For a selection of MPM and MPA mobilehome park inspections, determine the total and average number of hours spent on inspections. Additionally, to the extent possible, determine the total and average number of hours spent on inspections of mobilehomes pursuant to applicable state regulations.
 - (c) To the extent possible, determine the percentage of time inspectors devote to those inspections as opposed to other inspection work.
 - (d) Review the adequacy of HCD's budget for staffing to address MPA complaints and MPM program inspections.
3. Evaluate HCD's processes and practices related to inspecting parks by doing the following:
 - (a) Identify and assess HCD's policies and procedures for selecting which parks it will inspect each year, including the factors it considers in doing so.
 - (b) Review and evaluate HCD's policies, procedures, and tools related to inspections and, to the extent possible, determine whether they incorporate best practices.
 - (c) For a selection of inspections from the last three years, assess inspectors' compliance in conducting inspections according to HCD policies and procedures or any other applicable requirements. Evaluate the methods inspectors use to conduct and document these inspections.
 - (d) For the same inspections, to the extent practical, assess their quality by analyzing the scope and the amount of time taken to conduct the inspections and whether the time was adequate.
4. Identify and assess HCD's policies, procedures, and practices to ensure that inspectors are impartial and preserve the appearance of impartiality during their inspections. Determine the extent to which park management or residents join inspectors during inspections and whether that involvement is appropriate.

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5. Compare the MPA complaint inspection and MPM program inspection processes and, to the extent possible, identify opportunities for coordination between them that may result in new benefits or efficiencies.
6. Assess HCD's use of its inspectors by doing the following:
 - (a) Identify the number of inspectors conducting MPA-related complaints and MPM program inspections and assess their workloads.
 - (b) Identify and assess inspectors' qualifications and whether HCD ensures that they comply with any ongoing training requirements.
 - (c) Analyze how HCD allocates inspectors between inspections of MPA complaints and MPM program inspections and whether inspectors can and do perform both types of inspections.
 - (d) Determine and evaluate the factors HCD considers when it assigns inspectors to conduct inspections.
7. Review the adequacy of notice given to affected parties in the inspection process.
8. Review HCD's policies, procedures, and practices to determine the amount of time HCD provides to park residents and management to remedy violations identified during inspections. Assess what occurs when residents and management do not remedy violations and, to the extent possible, identify opportunities to increase the number of violations remedied.
9. Review and evaluate inspectors' follow-up visits after inspections to ensure compliance by doing the following:
 - (a) Assess whether HCD's policies and procedures provide guidance on follow-up visits after inspections, and determine whether these visits are considered part of MPM program inspections or the MPA complaint process.
 - (b) For a selection of inspections from the last three years, determine the frequency of follow-up visits conducted by HCD.
 - (c) For those inspections, determine which types of violations were subject to follow-up and how HCD deemed the inspections complete and violations resolved.
10. Evaluate the extent to which HCD makes inspection records available to the public.
11. Review and assess any other issues that are significant to the audit.