

**From:** [Sunset Advisory Commission](#)  
**To:** [Janet Wood](#)  
**Subject:** FW: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)  
**Date:** Tuesday, June 24, 2014 3:38:18 PM

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-----Original Message-----

From: sundrupal@capitol.local [<mailto:sundrupal@capitol.local>]  
Sent: Tuesday, June 24, 2014 3:28 PM  
To: Sunset Advisory Commission  
Subject: Form submission from: Public Input Form for Agencies Under Review (Public/After Publication)

Submitted on Tuesday, June 24, 2014 - 15:28

Agency: DEPARTMENT STATE HEALTH SERVICES DSHS

First Name: William R.

Last Name: Jordan

Title: Code Enforcement Officer-in-Training

Organization you are affiliated with: City of Howardwick

City: Howardwick

State: Texas

Your Comments About the Staff Report, Including Recommendations Supported or  
Opposed:  
June 24, 2014

Dear Sunset Commission:

I am registered Code Enforcement Officer in Training serving both the City of Clarendon and the City of Howardwick. Both Cities are small, rural Communities who are just this year beginning to enact the enforcement of City Ordinance and State Code. Both Cities are served by the Donley County Sheriff's Office for Law Enforcement, as neither City has a Police Department. As I'm sure you know, County Sheriff Offices do not engage in Code Enforcement, but enforce the State Penal and Transportation Codes.

In addition, Code Enforcement Officers identify with the same citation powers as Police Officers, Sheriffs, Marshals and others, making a registered Code Enforcement Officer a de facto Law Enforcement Officer – although not a Peace Officer. While many of the safety risks and dangers are the same, Code Enforcement Officers typically do not deal with the criminal element of enabling legislation and ordinances as do Peace Officers.

Per Local Government Code, Chapter 51 – a Municipality may authorize Code Enforcement Officers to issue citations for code violations. This citation ability derives from the 'Policing Powers' granted to a Municipality. Thus, it is not reasonable to assume that the 'Title' of Code Enforcement Officer is an empty or meaningless one. It is a required credential, essential to the authority necessary in the professional performance of our duties.

Neither the City of Clarendon nor the City of Howardwick supports the recommendation of the Sunset Commission to deregulate the registration requirement for Code Enforcement Officers. If anything, Code Enforcement Officers

should have stricter training and operational standards than what is currently required. After all, Texas is a very large state, and there are only 2,201 of us.

We therefore highly recommend that you do not abolish our most critical credential, but send us instead to the TDLR for proper regulatory licensing.

Thank you very much for your time and attention in this matter. Please feel free to contact me with any questions or further discussion.

Any Alternative or New Recommendations on This Agency: Send Code Enforcement to TDLR.

My Comment Will Be Made Public: I agree