

Date:	February 21, 2020
То:	Councilmember Dan Strauss, Land Use & Neighborhoods Committee Chair
From: Subject:	Nathan Torgelson, Seattle Department of Construction & Inspections Director Responses to Written Council Confirmation Questions

1. What are your major goals for the Seattle Department of Construction and Inspections (SDCI) over the next four years?

As Department Director my role is to keep our Department functioning at a high level while staying true to our purpose statement of "helping people build a safe, livable, and inclusive Seattle." We have had many challenges keeping up with the unprecedented levels of growth in Seattle. I am committed to continuing to improve the permitting process and working with the City Council to advance our work on numerous fronts, including housing production, revised tree regulations and small business permitting reform, while keeping a race and social justice lens at the core of everything we do. SDCI must continue to provide key assistance to property owners and tenants, including adapting to changes in our landlord-tenant regulations and ensuring that people can count on their homes to be safe and livable. Customer service is key: we must continue to be responsive to the public and to our applicants.

Some of my specific goals for the next four years are to:

- Create a <u>seamless and more streamlined permitting process</u> where customers can obtain faster and more efficient approvals, with affordable and middle-income homes receiving priority review. Make it easier for applicants and the general public to understand the process using a variety of strategies, including code reform, technology, training, and intra-department coordination.
- Adopt a program to <u>address unreinforced masonry (URM) buildings</u> to give clear direction to URM building owners.
- <u>Identify additional resources for our code compliance work</u>. As our city grows in population and employment, the code compliance workload has increased significantly.
- Anticipate and permit <u>innovative housing</u> construction types to increase our supply of affordable and middle-income housing and provide flexibility for the <u>rapid housing of people experiencing</u> <u>homelessness</u>.
- Recruit <u>the next generation of employees</u>, prepare for the wave of retirements, and retain and train existing employees.
- 2. What have been SDCI's successes under your leadership and what do you see as the primary near and long-term challenges facing SDCI?

Successes:

Overseeing a period of unprecedented growth in Seattle, resulting in record levels of permitting, inspections and code compliance at SDCI: This trend started as the local and national economies began to recover from the great recession, and SDCI has set a record number of issued permits for seven consecutive years, a stretch that began in 2013 with 42,958 permits issued and continued in 2019 with 55,065 permits issued. Since 2015, SDCI has issued 3,129 Master Use Permits (MUPs), along with 27,447 construction permits, with the total value of these construction projects exceeding \$19 billion, adjusted for inflation. This construction

has resulted in <u>34,114 net new housing units</u> built since 2015, with another 23,348 units permitted but not yet constructed. These high permitting volumes have also kept SDCI's inspections staff busy, with nearly 950,000 inspections occurring over the past four years. I recognize that we still have a challenge to keep up with demand.

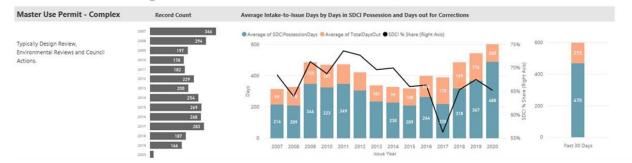
Average total throughput times for simple/medium construction projects has decreased from 79 days in 2018 to 67 days in 2020 YTD.

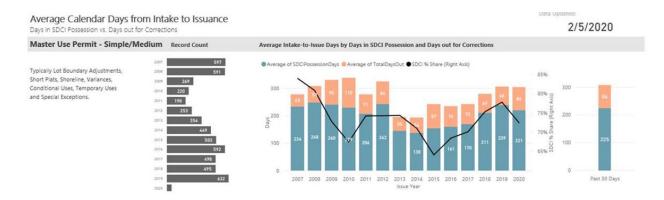


The same trend is beginning to show with complex construction projects with a deduction from 193 days in 2019 to 174 days in 2020 YTD. Also note that the percentage time these permits are in SDCI's control continues to decline as an overall percentage of total throughput time is now just a bit over 50% of total time.



Average Total Throughput Times for Master Use Permits have also steadied, but the average time in SDCI's court has reduced for Simple/Medium MUP Projects from 239 days in 2019 to 221 days in 2020 YTD (which is lower than during most of the period from 2007-2012). The same trend has not yet shown up in the Complex MUP Projects with an increase from 367 days in 2019 to 488 days in 2020 YTD (which may include an outlier or two issued in the first 5 weeks of this year that are driving up that average.)





<u>Addressing Vacant Buildings</u>: Working with Council, we have started an enhanced Vacant Building Monitoring program, which works to ensure that vacant properties remain secured and do not turn into public safety hazards. In addition, in limited circumstances, we have authorized emergency demolition of vacant buildings where excessive public safety issues have been occurring.

<u>Working with tenants and landlords</u>: We greatly appreciate Council's support for the *Renting in Seattle* outreach program, including the web portal, translated information, and phoneline. This program also provides trainings to landlords and to tenants as well as grants to community partners to help educate these populations about regulations and protections in Seattle. With over 50% of housing units in Seattle now used as rentals, our Rental Registration program creates an inventory of rental units across Seattle and coordinates inspections to ensure they are safe and legal places for people to live.

<u>Outreach</u>: In 2016 we implemented the annual <u>South Seattle Home Fair</u>. The home fair, located in the community on a Saturday, is a way for SDCI to be more accessible to customers that might otherwise not be able to access our services. The home fair is a great opportunity for residents to come meet with staff from our department to ask questions about our permitting process, code enforcement, inspection requirements, rental housing regulations, and pretty much any other service that SDCI provides. We also partnered with local organizations and other City departments to expand the types of information available to our customers. In 2019, based on the success we had for the South home fairs, we added a <u>North Seattle Home Fair</u>. Over the past 5 years, we've served hundreds of customers at the home fairs. About 30% of those customers have been from historically underrepresented communities. Finally, we've reached hundreds of landlords and tenants about our rental housing regulations through dozens of public meetings where we have partnered with other organizations.

<u>Stabilization for the future</u>: We know the economy will not continue at this pace. We have undertaken a great deal of planning internally for how we handle an economic downturn and its impact on permit revenue, including how we will retain staff and subsequent institutional knowledge. I greatly appreciate the Council's support of our 2019 Permit Fee Ordinance, adopted in November 2018, which will help stabilize our Department during the next downturn of the economy.

Challenges:

The short- and long-term challenges include addressing the next economic downtown, succession planning, earthquake preparedness, resources for code compliance, housing affordability for Seattle residents and balancing the need to rapidly house the homeless with building and life safety codes for existing structures. Many of these challenges are discussed under major goals above. As it is difficult to accurately predict

changes in market demand, we are always looking for ways to respond quickly in our ability to hire new positions to meet these changes. We are also struggling with balancing the need to reach our climate change goals for the City and adopting new energy code requirements with the desire to reduce the permitting and regulatory cost of creating new homes and workplaces.

The level of unprecedented growth has created stress on our overall permit review timelines, as discussed further below in Question 3. We know that there are changes we need to make internally to continue to make progress in reducing these permitting times, and we are dedicated to doing so. We also know that there is a strain on external contributors to the permitting process – engineering and architecture firms, for example – that are equally busy and can also add time responding to correction cycles. We are committed to working both on our internal process to improve review times as well as better coordinate with external permit stakeholders to reduce the number of correction cycles and responses necessary to complete our reviews.

- 3. What actions are you taking to improve permit review times for simple and complex projects? By when should the Council, applicants, and the public expect improvements to be made? How will you ensure transparency with respect to review times and other metrics?
- 4. Minor corrections to applications that are resolved through direct person-to-person communications, as opposed to through correction notices, can greatly reduce overall permit review times. What barriers, such as software limitations, supervisory span of control, or otherwise, exist to such person-to-person communications? What steps have you taken to encourage such communication?

I fully recognize that improving permitting times is one of our biggest challenges at SDCI and I am fully committed to improvement. We still have work to do.

With Accela (and related side-system interfaces), there have been issues which have caused delays. We will continue to work with Seattle IT as we alleviate these issues. We have made a great deal of progress with this program and see it as an important and useful tool for our Department, one that will streamline the process for tracking and review. We have expanded our team to help with the increased permit workloads and continue to work with Seattle IT to coordinate necessary improvements.

We recognize that not all Seattle residents and applicants have the same level of technology access or skills, and we will continue to provide one-on-one assistance to help them navigate the permitting process and our technical codes. We also recognize that the design community in Seattle is very busy, with an increased workload during this economic boom. We continue to work with our applicants to help prevent delays in responses to our corrections, which can slow down the permitting process. We are piloting Bluebeam, a software system used by design professionals and other jurisdictions, which can allow us to make simple corrections to plans in-house in real time with the applicant, without requiring another round of corrections. We are urging staff to use the telephone to resolve minor issues and corrections with applicants, rather than sending out additional correction notices.

Last year we hired and trained 13 term-limited staff in SDCI's Land Use Division to help address the MUP application backlog. Resolving these issues and improving performance has and will continue to be a top priority for SDCI. Seattle IT has received authority in their 2020 budget to hire 9 new FTE to address SDCI specific Accela issues and 8.5 additional staff for the permitting software team. With this additional staff, I am confident that most of our Accela-related issues can be addressed by the end of the next budget cycle for which they were approved, 2021. This support will then be able to focus on a continuous improved user experience and greater integration of related tasks with our partner City departments.

The average total throughput times for construction permits have steadied, but the average time in SDCI's court has reduced for simple/medium construction projects from 79 days in 2018 to 67 days in 2020 YTD. The same trend is beginning to show up in the complex construction projects with the reduction from 193 days in 2019 to 174 days in 2020 YTD. For MUPs, the average time SDCI takes with a permit has reduced for simple/medium Projects from 239 days in 2019 to 221 in 2020 YTD. This number is lower than those seen during most of the period from 2007-2012. We still have work to do with complex MUP permitting times.

We currently have much better data on the permitting timelines for our building permit and MUP applications, including time out with the applicant for corrections. I am committed to posting our timeline performance on our website this year. I am also excited that our user-friendly website, Shaping Seattle, will be back online 2Q 2020 and will allow the public via a Seattle map to easily track permitting and design documents. This is another example of our partnership with Seattle IT, and our commitment to improving user experience and access to information with innovative and understandable technology.

5. Elaborate on your goals for enforcement and compliance. What do you see as the limitations of a complaints-based system, and how do you intend to address those limitations?

Our goal as a Department is to bring people into compliance, and enforcement can be part of this. While there are sometimes egregious violations when we need to take emergency action – and we will do this when necessary – we also know that most people aim to come into compliance when they are informed that something they are doing is not permitted or is of concern. It's often an education process to help people with code violations understand the issue, the rules in place that get us involved, and how to keep the problem from occurring again in the future. The public must be aware of our presence, know how to reach us, and trust that we'll respond. We also work to build trust that if a tenant reports concerns with their home; they will not face retaliation. Our outreach team has been going into communities and teaching landlords and tenants about our enforcement areas and inviting them to share their complaints with us. Recent changes made to the Vacant Building Monitoring Program apply a pro-active approach to vacant buildings, rather than simply complaint based. We now require owners to register vacant units when applying for permits and mandate monthly inspections to ensure they remain secured.

Specific to tenant issues, we are focused on keeping the Rental Registration and Inspection Ordinance's (RRIO) proactive inspection program functioning smoothly and continue to build on tenant outreach.

6. Please describe your approach to integrating the City's Race and Social Justice Initiative (RSJI) into SDCI's work—both with external stakeholders and within the department. For example, how does SDCI reach out to constituencies that have not historically participated in permitting and enforcement activities, and are not usually represented in your department's discussions? How does SDCI incorporate RSJI strategies to advance racial equity within internal programs and department operations?

Equity is the first of our listed departmental values. SDCI always works to provide fair and welcoming access to services that meet the needs of the people we serve. We continually work to identify and mitigate the disparate impacts of our policies and procedures on all communities by applying RSJ principles to our daily work and interactions as well as remaining dedicated to learning and practicing respectful, culturally aware communication both within our Department and externally. To fully infuse these principles across our Department we plan to hire an RSJI Senior Advisor over the coming year. We realize that some communities do not have the same resources as others to track or challenge permits, either as applicants or neighbors, or to track or report code violations.

We hired a multimedia public relations specialist a couple of years ago as we have heard strongly from Department of Neighborhoods Community Liaisons that <u>making our public information more visual</u> is an important way to provide complex information in a form that can be understood by customers that may not routinely work with us. Our community engagement team has a goal of producing 60% of all new information material using informative visuals and graphics. Examples include our new vacant building flyer and our electrical inspections brochure and instructions, and a forthcoming rental handbook.

We also worked with Department of Neighborhoods Community Liaisons last year to help us <u>evaluate our</u> <u>website structure</u>. We made several changes to our website a couple of years ago based on a previous community liaison evaluation. For this evaluation, we wanted to know if we had accomplished most recommendations previously made, and if there were additional changes that could be made to further improve our website for historically underrepresented customers. We were pleased to find that we had accomplished the recommendations that the liaisons had made. The liaisons had some good suggestions for additional improvements that we will start making this year. One example is having a separate webpage for each language, instead of all languages on one page for each topic. Another example is producing more video content.

<u>Our Renting in Seattle program</u> continues to work to meet the community where they are and to bring resources on tenant protections while partnering with OCR and OH to provide information to tenants. For the diverse renter population, we work closely with DON, OIRA, and other partners to bring our information to historically underrepresented communities. This includes translated materials, presentations, tabling at community events, and using DON Community Liaisons to assist with culturally relevant outreach. We also use our grants to community partners to build and strengthen relationships with organizations serving historically underrepresented communities.

7. Are there opportunities in the permitting or development process to review the racial equity and displacement impacts of proposed development projects?

As a Department, we base decisions on adopted codes, regulations, and SEPA policies. We use these as a basis for authority when we review projects that come before us for review. When displacement occurs, we use our Department's Tenant Relocation Assistance Program, which provides required early notification and ongoing communication to tenants. Low-income tenants in these circumstances qualify for relocation funds, which have been adjusted annually based on CPI.

We are continuing to explore with the Office of Planning and Community Development (OPCD) policies around housing displacement and related changes to the Land Use Code and Comprehensive Plan. Additionally, we participate in interdepartmental teams created to explore these issues and proposed solutions and are looking for ways in our budget to expand our work in the Race and Social Justice Initiative.

8. What is your general philosophy for how to most effectively work with the City Council? Has your thinking on this evolved since your initial appointment?

We recognize and value our ongoing and open communication with City Councilmembers and their staff. We have seen firsthand the value of this ongoing communication and recognize that Council can oftentimes be the best carrier of messages about new policies, regulations, and opportunities in their communities with their constituents. We also continue to work with Council offices to coordinate responses to questions or concerns from constituents in a timely manner. Since my initial appointment four years ago, I worked to create a dedicated City Council Liaison position within the department for the first time to ensure that we are providing more timely information to Councilmembers, working cooperatively on legislative issues, and creating and carrying out policies that truly benefit the city and its residents and businesses.

9. How will you ensure that Council members and legislative staff receive timely information needed from your department for Council to make sound policy and financial decisions?

Our City Council Liaison and other members of SDCI meet regularly with City Council staff and with Councilmember Strauss, Chair of the Land Use and Neighborhoods Committee. We also reach out to other Councilmembers on many issues. We work closely with Central Staff and the City Budget Office to help provide clarity on potential financial and policy impacts of changes being proposed and continue to provide technical assistance on Council-sponsored legislation.

10. Describe your approach to working with other City departments, particularly on the issues of housing affordability and commercial affordability.

We worked closely with the Office of Planning and Community Development on the design and implementation of the Mandatory Housing Affordability (MHA) program, including providing expertise on necessary code development. We prioritize the permitting of affordable housing projects, in coordination with the Office of Housing, to quickly move these projects through the permitting process so applicants can begin construction of these much-needed units. We also continue to work with the Mayor's Office and the Mayor's Affordable Middle Income Housing Advisory Council (AMIHAC) and the Mayor's Small Business Advisory Council on developing ideas to make the permitting process easier and more transparent, supporting and educating small business owners, and on ways to encourage more housing.

11. The Council frequently receives complaints about tree removal associated with development. Please describe any steps SDCI has taken to reduce illegal tree removal and improve enforcement of regulations for tree protection.

There have been several steps taken to reduce illegal tree removal and improve enforcement to better protect trees in the city. Some of more recent highlights include:

- Increased Education: SDCI has actively been working to increase awareness about tree protection on our website. We have recently completed a series of updates including tree protection details, signage specs, and new updated Tip Sheets.
- Increased Civil Penalties and Enforcement: SDCI published a new Director's Rule 17-2018 Calculating Tree Valuations and Civil Penalties for Tree Protection Code Violations. It gives greater protections to tree groves and increases the penalty amounts for willful and malicious cutting.
- More Staff: SDCI hired two new arborists to assist in the more complex tree permit reviews. The Mayor also approved funding for SDCI to hire additional zoning planners to assist us with the current workloads. These new planners have been trained in additional tree protection techniques and tree impacts issues so that they now review plans for site disturbance of trees and issue corrections when an applicant fails to show all existing trees in their submitted plans.
- **Technology Updates:** We are actively implementing the latest technologies available to us to track "trees in and trees out" for development. This will be helpful data for us as we learn what trees exist on private property, especially in the single-family zones where most of the tree canopy is

located. This new information will allow us to better document how many trees we are preserving and/or replanting in different stages of development. Once this is implemented, we can assess the data for any adjustments that may be necessary for further improving protections.

12. Last year the City Council and Mayor adopted Resolution 31902 calling for an update to tree protection regulations. Can you commit SDCI's code development resources to work with Council on this update?

We are already undertaking several items as requested in the resolution. One of the most challenging ones is updating the Exceptional Tree Director's Rule that has been in place since 2008. Another work item from the resolution is tree tracking which was part of the tree presentation at the Land Use and Neighborhoods Committee briefing on February 12, 2020. We will continue to explore additional strategies as part of the scope, schedule and budget for ongoing tree protection update work. We expect to complete the updates using existing staff resources from Code Development, Land Use Services, Engineering Services, and Code Compliance work groups. The technology-related work to accomplish tree tracking is already in the existing IT budget, and as noted in the resolution there will be continued quarterly reports on this work this year by OSE and SDCI. We look forward to working with Council throughout the year on this issue.

13. SDCI implements City policy by administering and enforcing regulations. How do you coordinate with other departments, the Mayor, and the Council when a regulation does not appear to be achieving its policy purpose?

Cities are dynamic places, and regulations need to change as cities change. Responding to these changes is a part of our work at the City. Recent changes to the design review process and accessory and detached dwelling units are two examples. We consistently evaluate and seek feedback to ensure that there are not unintended consequences or disproportionate impacts to certain groups or populations. Through our conversations with the Mayor's Office and Council, we can raise these issues – as well as have them raised to us – to ensure that we can make necessary changes or shift our actions. Additionally, SDCI staff meet regularly with counterparts in other departments to review any operational issues and improve communication and response times.

14. How do you view SDCI's role relative to the issues of housing and commercial affordability for small business and service providers? Are there opportunities to use SDCI processes to promote affordability in the development of housing, childcare facilities, and small business spaces?

Existing Incentive Zoning regulations and the MHA program both build in regulatory requirements for providing childcare and affordable housing contributions with new development. We also continue to work with the Mayor's Affordable Middle-Income Housing Advisory Council (AMIHAC) and the Small Business Advisory Council on their ideas to make the permitting process easier and more transparent, and on ways to encourage more housing.

As part of her State of the City address, the Mayor announced the Small Business Relief Package. SDCI will hire its first-ever Small Business Permit Facilitator. This role will focus exclusively on streamlining the permitting process for small businesses and will foster an opportunity for businesses to engage us early; before signing a lease." In addition, OED will introduce a Small Business Permit Education Pilot, which will provide workshops and technical assistance to help small business owners meet permit application requirements. OED is also developing a digital Small Business Permitting Roadmap, which will give business owners a step-by-step guide to navigating the permitting process.

15. What work is SDCI undertaking to address unreinforced masonry structures? Do you have a scope and timeline for that work? Are there opportunities at the state level to support investments in seismic retrofits?

The catastrophic impact an earthquake in our city will have on the unreinforced masonry buildings and the people that live and work in them is one of the issues that keeps me up at night. We know these buildings exist across our city – they are buildings we live in, work in, and count as our historical treasures. SDCI has been a key part of stakeholder groups convened to figure out the best method to address this issue and the best way to complete necessary seismic retrofits. A program designed to assist with these retrofits is complex. We want to be sure to approach any program design thoughtfully, with an eye to how to mitigate impacts such as displacement or costs of a retrofit being passed on to the building tenants. We also must coordinate internally to address City owned buildings that require retrofits, determining how to fund these projects that span multiple departments. We look forward to continuing to engage with the Office of Emergency Management, Office of Planning and Community Development, and the Office of Immigrant and Refugee Affairs to best determine a path to making our city a safer place to live and work. We also look forward to partnering with Council on how to move this important body of work forward in near future.

16. SDCI oversees programs and enforces policies that involve complex and technical information and processes that may be challenging for the public to navigate. Describe your approach for increasing the accessibility of systems and information administered by the department.

We consistently strive to improve our public facing communications to make them user friendly and to remove barriers in understanding the work we do. We continually update our material on a variety of programs housed within SDCI into 13 written languages and 12 spoken languages for critical life-safety publications and 7 written and 6 spoken languages for important information for the community. We also know that people retain information that is presented visually better than when it is presented as just text on a page. We know that using visual communication can increase our customers' comprehension and can break down barriers to accessing our information to the public. For those reasons, along with equity considerations mentioned earlier, we are emphasizing visual communication methods when we produce outreach and engagement material. We have worked with a consultant and internal staff as well as staff from other departments to review our material and make recommendations of how to improve the readability as well as visibility for those who are visually impaired. I have also challenged our communications staff to produce videos to place on our website.

Additionally, we work with Seattle IT to support a technology training team, providing leadership to the Citywide platform in providing training materials to both City employees and customers. The team will pilot several community training opportunities this year in support of the varied needs of the users of our permitting system. Training will continue to be provided to all through Skype sessions, which are also recorded for later reference. Trainers will also pilot holding sessions at locations throughout community locations where customers may get assistance. The team will continue to partner with SDCI's Communications team to provide video, visual, and other recommended content that will help all customers better access information.

In 2019, we funded a study that will evaluate the user experience and provide Seattle IT with key insight necessary to make great improvements to the portal utilized for all users of Accela. The study will benefit our department, yet as core users of an enterprise software system, this work will have benefit for all departments on the platform and all users. This critical research and resulting recommendations will shape

informed system improvements that can be measured for successful implementation. It will also inform how SDCI may better interact with customers.

17. How have you accounted for the experiences of frontline staff when developing and implementing policy changes?

Our staff are a great resource – they are interacting with our customers in real time and can provide useful feedback for our programs and policies. One example has been with the Rental Registration and Inspection Ordinance (RRIO) program. Our staff helped us improve policies for the timing of RRIO registrations and flagged the need for city regulations requiring receipts for cash payments. Another example came from our inspections team, who let us know that some populations misunderstood who our inspectors worked for – the misconception was that they were Immigration and Customs Enforcement (ICE) agents. We quickly put together translated business cards our inspectors could hand out identifying them as City employees, not ICE agents. We need to be nimble in responding to the needs and concerns of Seattle residents, and our staff are key to helping us make changes or adapt policies when necessary.

SDCI employs a Strategic Advisor who focuses on our Organizational Development, including Change Management. We analyze the impacts of the work that we do on employees across the department. Through regular polling, check-ins, committees, and development teams, all staff, including frontline staff, can give honest and direct feedback on impacts, and we can nimbly and innovatively assist with modifying their employee experience.

18. The development cycle in Seattle will likely slow in coming years. What proactive steps is SDCI taking to prepare for the associated reduction in permitting activity and fee-revenue?

As the majority of SDCI's budget is fee related, any reduction in revenue impacts our Department. When the last economic downturn hit in 2008, we were forced to lay off a significant number of staff across the department. We were able to hire some of them back, but still had to go through the process of hiring and training former and new staff. This created instability for our employees and impacted our ability to carry out our day to day operations at the same level and it proved difficult to catch up with increased permit applications. We have taken great steps to prevent this from happening when we experience our next downturn. Thanks to the support of Mayor Durkan and the Council, in November 2018 the Council adopted a new Permit Fee Ordinance for our Department. This has allowed us to build a reserve which will stabilize our staffing levels during the next downturn and will allow us to continue to provide quality service to our customers during the downtown and when the economy ultimately rebounds.

19. How does SDCI create opportunities for advancement within its workforce? Given the high number of recent retirements, what efforts has SDCI undertaken for succession planning and recruiting?

SDCI recognized the critical need for a succession plan in 2019, making it a top priority for SDCI's Administrative Division to deliver in 2020. We are currently interviewing consultants who can shape the process. We have been working with SDHR since mid-2019 on aligning our study, which will also include classification and compensation review. We continue to provide strong leadership in Citywide Human Resources efforts to increase equity in recruitment and hiring practices. We used an anonymous interview process to increase equity in consideration in 2019 (interviewers were not provided resumes during the interview) and will roll out the full program in 2020. We continually strive to reach a wider candidate pool for every recruitment and have proven to be leaders in our efforts. We have also been proactive about

critical retirements in our budget process. For example, we recognized that our principal engineer and building official, who is also our chief safety officer, will be retiring soon, and that his position would be best split for succession into two positions and roles. We continue to pursue budget authority to make these critical decisions in advance of the retirement. Our HR team will continue to provide demographic information on our workforce that prepare us to make proactive organizational strategy decisions for staffing. We work to provide professional growth plans, mentoring employees in order to prepare for succession planning. We encourage career growth with respect to employees taking certificate examinations, including providing study guides and time for discussions that are useful in preparation.