



**Review and Investigation of Code Enforcement Policies,
Procedures, and Inter-Agency Communications
Between DCRA, FEMS, and MPD**

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**PRIVILEGED AND CONFIDENTIAL
ATTORNEY WORK PRODUCT**

Submitted To:

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I. EXECUTIVE SUMMARY

In March 2019, an officer with District of Columbia Metropolitan Police Department (“MPD”) reported code violations to both the Department of Consumer and Regulatory Affairs (“DCRA”) and District of Columbia Fire and Emergency Medical Services (“FEMS”) regarding unsafe conditions in an unlicensed rooming house located at 708 Kennedy Street NW (“708 Kennedy”). Nearly five months after the reporting officer (“MPD Officer”) initially reported this unsafe property to DCRA and FEMS, a fire occurred at the property causing the deaths of two tenants.

In the aftermath of the fire at 708 Kennedy (“708 Kennedy Fire”), the Office of the City Administrator (“OCA”) engaged Alvarez & Marsal (“A&M”) to conduct an independent review and investigation into the code enforcement process and communication procedures between DCRA, FEMS, and MPD (collectively, “District Agencies”).

Over a period of five weeks, A&M reviewed code enforcement policies and procedures, email communications, systems data, and activity logs. A&M researched best practices and conducted over 25 interviews of key staff to present a report detailing findings and observations regarding:

- (1) actions taken by District Agencies to address reported violations at 708 Kennedy (“708 Kennedy Complaint”) prior to the fire,
- (2) identification of gaps in code, policies, and procedures related to the handling of reported violations at 708 Kennedy in advance of the fire,
- (3) recommendations to improve policies and procedures and communications within and across the agencies.

As a result of this review and investigation, A&M has identified key findings (“Findings”) which constitute the most critical missteps which, if handled differently, could have reduced the likelihood of loss in the case of the 708 Kennedy Fire. In this report, A&M has also outlined several observations which reflect underlying issues which have contributed to or could contribute to failure by the District Agencies to remedy unsafe buildings (“Observations”).

A. Key Roles

The Findings reference many roles across DCRA, FEMS, and MPD. For ease of reading the below Findings, A&M has included the following table which lists the key individuals and responsibilities relative to Findings.

Table 1 - Key Roles

Agency	Position	Description of Role	As Referenced Within Report
MPD	MPD Police Officer	Officer who reported the 708 Kennedy Complaint	MPD Officer
DCRA	Community Outreach Specialist, Office of Communications	Part of an account management team tasked with handling escalated customer service issues for strategic accounts	DCRA Community Outreach Specialist
DCRA	Program Manager, Housing Inspections / Duty Officer	Program Manager - manages housing inspection assignments; Duty Officer - available for emergency response on a 24-hour basis as the primary agency contact for after hour emergency incidents	DCRA Duty Officer
DCRA	Program Analyst, Regulatory Investigation Section	Processes investigations intake after Program Manager or Program Officer assign investigator to a case	DCRA Investigations Intake Analyst
DCRA	Program Manager, Regulatory Investigation Section	Also referred to as Chief Compliance Officer. Oversees the activities of the Regulatory Investigation Section	DCRA Investigations Program Manager
DCRA	Program Officer, Regulatory Investigation Section	Supervises caseload of investigators. When the Investigations Program Manager left DCRA approx. June 2019, the Investigations Program Officer took over the Program Manager's responsibilities on an interim basis	DCRA Investigations Program Officer
DCRA	Investigator, Regulatory Investigation Section	Investigator assigned to 708 Kennedy Complaint	DCRA 708 Investigator
FEMS	Lieutenant - Technical Section	Lieutenant in FEMS Technical Section	FEMS Technical Section Lieutenant
FEMS	Lieutenant - Administrative Officer	Administrative Officer at FEMS responsible for assignment of Fire Inspectors	FEMS Inspections Lieutenant

B. Findings

The findings below are organized by Agency, for a chronological series of events, please review the *Key Findings* section of this report.

Table 2 - Key Findings

Finding	Description
Seven Critical Missteps within DCRA	1) March 22, 2019 – The DCRA Community Outreach Specialist was one of four DCRA employees who received the initial email from the MPD Officer that reported the violations at 708 Kennedy. Within 15 minutes of receipt of the email, the DCRA Community Outreach Specialist forwarded the email to the DCRA Duty Officer with the Public Incident Report (“PIR”) attached and then immediately replied via email to all individuals on the initial email indicating that the email was forwarded to the DCRA Duty Officer. However, the Community Outreach Specialist communicated with the DCRA Duty Officer using non-standard communication protocol, having emailed the MPD Officer’s communication, which included the information of urgent and unsafe conditions rather than following standard operating procedures (“SOPs”), which required contact via the Homeland Security and Emergency Management Agency (“HSEMA”) by telephone. The DCRA Community Outreach Specialist followed improper protocol by communicating an urgent complaint to the DCRA Duty Officer via email. 2) March 22, 2019 - The DCRA Duty Officer (a trained inspector and the Inspections Program Manager) did not respond to the initial 708 Kennedy Complaint forwarded by the DCRA Community Outreach Specialist via email and did not ensure that the complaint was assigned to the appropriate individual(s). The DCRA Duty Officer did not address the 708 Complaint immediately as an unsafe building or route the complaint appropriately for inspection or investigation. 3) April 24, 2019 – The MPD Officer emailed the DCRA Investigations Intake Analyst on April 24, requesting that a DCRA investigator be sent to 708 Kennedy. The DCRA Intake Analyst followed the normal intake process of first routing the complaint to the DCRA Investigations Program Officer and DCRA Investigations Program Manager for assignment. Neither the DCRA Investigations Program Officer nor the DCRA Investigations Program Manager assigned the 708 Kennedy Complaint to an investigator.

	4) May 21-24, 2019 – After a third follow-up email from the MPD Officer on May 21 regarding the 708 Kennedy Complaint, the DCRA Program Manager assigned the investigation of 708 Kennedy (“708 Kennedy Investigation”) to the DCRA 708 Investigator. The DCRA Investigations Intake Analyst notified the MPD Officer of the assignment. The DCRA 708 Investigator performed a limited investigation (reporting that the DCRA 708 Investigator visited, but did not enter the property, on three occasions - May 22, May 23, and May 24 - and did not evaluate the rear of the property) and failed to adequately document investigations activities and findings. 5) June – July 2019 – After a fourth email from the MPD Officer on June 3, this one sent directly to the DCRA 708 Investigator and the DCRA Investigations Intake Analyst, and a reminder to the DCRA 708 Investigator from the DCRA Investigations Intake Analyst on June 11, the DCRA 708 Investigator took no further action on the property in June or July. Due, in part, to the reassignment of the DCRA 708 Investigator, the DCRA Investigations Program Officer marked the case as “suspended” in the Program Officer’s log by July 26¹ without any case file or record of activities. 6) August 16, 2019 –The DCRA 708 Investigator never reached out to the MPD Officer, DCRA maintained no case file, and the closure of the case was not evidenced by a signature of approval. The DCRA Investigations Program Officer closed the 708 Kennedy case without any further investigation nearly three months after the DCRA 708 Investigator’s reported attempted visits in May. 7) March 22 – August 18, 2019 – Over the 5 months that transpired and the multiple follow-up emails sent to DCRA by the MPD Officer between the initial report of the 708 Kennedy Complaint and the date of the 708 Kennedy Fire, none of the nine DCRA employee that were aware of the 708 Kennedy Complaint or included on related communications, entered it into the pilot Customer Relationship Management database² (“Pilot CRM”), a tool launched by DCRA in February 2019 and utilized to track customer requests and complaints.
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¹ The Program Officer maintained an offline version of the QuickBase Investigations log, because of this, the exact dates of actions such as suspension or closure of cases are not consistently recorded in QuickBase.

² DCRA communicated to A&M that the CRM was a pilot at this time pending replacement by an enterprise CRM system. The Pilot CRM system, rolled out by DCRA in February 2019, was launched to help DCRA streamline the way it responded to customer inquiries and to ensure that such responses were done in a timely manner.

Two Critical Missteps within FEMS	1) March 23, 2019 – The FEMS Technical Section Lieutenant received the MPD Officer’s initial March 22 email and then forwarded the DCRA Community Outreach Specialist’s Response to the MPD Officer’s email without the PIR attachment to the FEMS Inspections Lieutenant. By forwarding the DCRA response rather than the MPD Officer’s original email with the PIR attachment, the FEMS Technical Section Lieutenant did not include the attached PIR including pertinent information regarding 708 Kennedy. 2) March 23, 2019 -The FEMS Inspection Lieutenant in receipt of the MPD Officer’s March 22 email (without the PIR attachment) made no attempt to follow-up with FEMS or MPD staff to verify complaints included in the email and did not effectively address the MPD Officer’s complaints.
No Critical Missteps within MPD	1) The MPD Officer’s initial email on March 22 did not include the exact address for 708 Kennedy – the property address was not referenced in the body of the email and the attached PIR referenced the 700 Block of Kennedy Street NW. However, had either agency followed-up with the MPD Officer, DCRA or FEMS could have easily overcome any information gaps left by the MPD Officer’s initial report. The MPD Officer’s diligence, evidenced through repeated follow-ups with DCRA, provided DCRA with multiple opportunities to address the unsafe building conditions at 708 Kennedy. The findings related to DCRA and FEMS outlined above prevented remediation of the unsafe conditions at 708 Kennedy prior to the fire.

The findings outlined above identify **nine critical missteps by DCRA and FEMS which contributed to the lack of action to remediate the violations reported at 708 Kennedy**. Each of these points, if repeated, could contribute to future events like the 708 Kennedy Fire.

C. Observations

Many factors contributed to the failure of DC agencies to remedy the concerns identified by the MPD Officer. **In addition to the agency-specific findings outlined above, A&M observed underlying issues which have contributed to or could contribute to failure to remedy unsafe buildings.** Note that the Observations identified below are based on DCRA systems and processes as they existed prior to the 708 Kennedy Fire.

These eleven observations are outlined below across four categories: Communications and Coordination Across Agencies, Systems Maturity and Utilization, DCRA Investigations Management, and Unlicensed Property Oversight.

Communications and Coordination Across Agencies

1. DCRA, FEMS, and MPD lack clear and well understood communication channels and processes for reporting, collaborating, and following-up on reported code violations
2. Lack of responsibility for and ownership of building safety issues across multiple agencies

Systems Maturity and Utilization

3. DCRA's Pilot CRM and Investigations Module are inconsistently used and lack functionality to enhance accountability
4. FEMS use of the Zoll system does not support transparency and accountability for the handling of complaints
5. Systems access is limited within and across District Agencies
6. Audit log unavailable for DCRA complaint and investigations tracking applications

DCRA Investigations Management

7. Lack of continuity of DCRA Investigations management personnel allowed the 708 Kennedy case to remain unresolved
8. Limited formal training or job requirements for investigators
9. No process for prioritizing properties for investigation
10. Oversight and accountability over investigations is limited

Unlicensed Property Oversight

11. District Agencies have limited resources and authority to investigate unlicensed rental properties

The District Agencies have introduced significant reforms in response to the 708 Kennedy Fire. A&M also notes that DCRA leadership recognized and understood many of the underlying issues prior to the Kennedy Fire and, as a result, is in the process of taking steps to change the culture, systems, and policies and procedures of the agency.

To mitigate the risk of future incidents like the Kennedy Fire, we recommend that **District Agencies take immediate action to remedy these identified issues**. Our recommendations for corrective action and relevant improvements made by the District Agencies to-date are outlined in the *Recommendations* section of the report.

II. BACKGROUND

On August 18, 2019, a fire occurred in the basement of the building at 708 Kennedy Street in Northwest DC. The property was being used as an unlicensed rooming house and did not meet the District's building or fire codes. The unlicensed rooming house had no working smoke detectors, no lighted exit signs or fire exit, one fire extinguisher that was not tagged, and makeshift doors with padlocks that would not allow occupants to exit in an emergency. The 708 Kennedy Fire caused the death of two residents, including a 9-year-old boy, who were trapped inside the building during the fire.

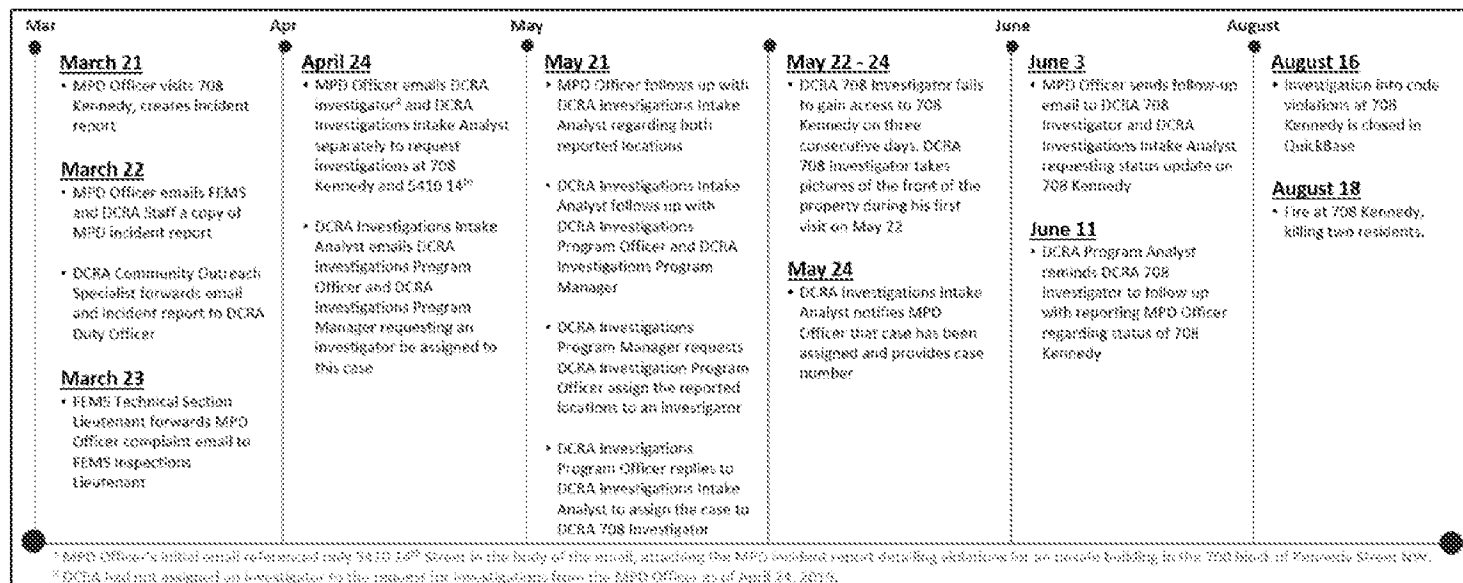
Five months earlier, an MPD Officer reported to FEMS and DCRA several apparent code violations and observed that 708 Kennedy was being used as an unlicensed rooming house. In the MPD Officer's PIR dated March 22, 2019, serious code violations were outlined in detail, emphasizing that both DCRA and FEMS should send inspectors to the location. The report was sent via email to two FEMS employees and four DCRA employees. Neither FEMS nor DCRA followed-up appropriately on the initial inquiry.

Over the next three months, the MPD Officer followed-up regarding the status of the request for investigation of 708 Kennedy with three different DCRA employees on four separate occasions. It was only after the MPD Officer's third follow-up request in May 2019 – two months after the initial complaint – that DCRA assigned an investigator to follow up.

The DCRA 708 Investigator reported attempting to gain access to the interior of the building and speak to the tenants on three separate occasions in May 2019 in order to investigate the reported code violations. The DCRA 708 Investigator documented only the first attempt with photos of the front of the building. The DCRA 708 Investigator never spoke with the property owner or any tenants, never visited the rear of the property, and never gained access to the interior of the building. Ultimately, no action was taken by DCRA or FEMS to abate the potential code violations. The case was suspended and later closed just two days before the fire at 708 Kennedy.

Figure 1 below provides a visual representation of the timeline of events from the date of the initial report by the MPD Officer to the date of the 708 Kennedy Fire.

Figure 1: Critical Events Related to 708 Kennedy Fire



A. Parties and Roles

A&M's review and investigation of the District's code enforcement process and inter-agency communications focused on three governmental agencies: DCRA, FEMS, and MPD. Each of the three District Agencies played a key role in the events leading up to the 708 Kennedy Fire.

1. DCRA

DCRA is responsible for the regulation of construction and business activity in the District of Columbia. DCRA provides a multitude of services to the District, including issuance of business & professional licenses, inspection and abatement of housing code violations related to construction activity, buildings, and rental housing, operation of the permit intake center, and review of construction compliance with building codes and zoning regulations. DCRA consists of the following divisions:

- Business and Professional Licensing Administration (BPLA) – comprises eight divisions including Business Licensing, Corporations, Consumer Protection, Professional Licensing, Regulatory Investigations Section ("RIS")³, Small Business Resource Center, Vending & Special Events, and Weights & Measures.

³ RIS was merged into the Consumer Protection Unit ("CPU") in 2019.

BETWEEN DCRA, FEMS, AND MPD

- RIS investigates complaints and proactively reviews business license applications to ensure businesses are operating in compliance with applicable licensing, zoning and corporation regulations and statutes.
- Inspection and Compliance – conducts construction inspections, house code inspections, illegal construction investigations, and certifies third party inspection agencies.
- Permit Operations Division – reviews applications for and issue Building Permits, Postcard Permits, Supplemental Permits, Certificates of Occupancy, and Home Occupation Permits.
- Regulatory Enforcement Administration – identifies and accounts for unoccupied property, conducts inspections of residential housing complaints that violate DC Housing code regulations.
- Surveyors – maintains records of all land plats and subdivisions of private and District government property.
- Zoning Administration – reviews applications for conformance with DC Zoning Regulations.

DCRA investigators within RIS investigate complaints against businesses providing services in and/or to the District of Columbia and issue Notices of Infraction for violations. DCRA Housing inspectors inspect buildings to ensure that they are in safe, habitable condition in compliance with the DC Housing Code.

2. FEMS

FEMS is responsible for the health and safety of the public through pre-hospital treatment and transportation, fire prevention, fire suppression and rescue activities, and homeland security awareness. FEMS is responsible for Fire Code enforcement in residential apartment buildings and commercial properties. The Property Maintenance Code has fire safety requirements for residential properties that are enforced by DCRA. FEMS and DCRA communicate to determine jurisdiction and coordinate response efforts. Within FEMS, the Assistant Fire Chief of Technical Services supervises the Fire Prevention Division. The Fire Prevention Division (“FPD”) is divided into four major branches:

- Administrative Support Services Branch – provides administrative support to FPD such as procurement, accounting of user fees, processing of fines issued, and compilation of monthly reports.
- Code Enforcement Branch – assigns Fire inspectors at all eight wards of the District. Fire inspectors’ responsibilities include routine maintenance inspections, investigation of fire code complaints, annual license renewal inspections, inspection of DC public schools, fire security for the President, fire safety inspection at large public gatherings, and public assembly inspections at nightclubs.

BETWEEN DCRA, FEMS, AND MPD

- Technical Inspections Plans and Permits Branch – performs specialized inspections required by operational permits specified in the ICC International Fire Code, as amended by the DC Municipal Regulations Fire Code (“DCMR”).
- Fire Investigations Branch – performs fire origin and cause investigations, arson investigations, and the juvenile fire setter’s intervention program.

3. MPD

MPD is the primary law enforcement agency for the District of Columbia. MPD is divided into seven districts determined by geographic location. MPD officers have a duty to report any violation of housing, building, or health codes that is encountered⁴ on the job to the appropriate District Agency. MPD officers also assist DCRA with contacting home and business owners to obtain information necessary to the code enforcement process.

B. Scope

A&M conducted a comprehensive review and investigation of the District’s code enforcement process – specifically focusing on the licensing and inspections process – and communications between DCRA, FEMS, and MPD related to the code enforcement process. Under the Statement of Work (“SOW”), the goal of A&M’s investigation is to determine what District Agencies did in the time leading up to the fire; what they should have done pursuant to the relevant District law or policy; and what policies and protocols need to be implemented to prevent future incidents similar to the 708 Kennedy Fire. Key activities performed by A&M included:

- Reviewing protocols, authorities, and practices for licensing homes, inspecting, and investigating properties for code enforcement compliance including communications between District Agencies.
- Recommending procedures to be implemented to improve the communications between District Agencies for reporting the violations and follow-up procedures.
- Reviewing the processes and communications that transpired between District Agencies in relationship to the Kennedy Fire.
- Documenting the procedures utilized regarding 708 Kennedy including the reporting of the violations by MPD to FEMS and DCRA and the follow-up procedures as they relate to the violations reported.

⁴ Section V, Article 22 of General Order 201.26

BETWEEN DCRA, FEMS, AND MPD

- Determining the breakdown in communications between MPD, FEMS, and DCRA when reporting and enforcing code violations and making recommendations for improvement.
- Interviewing agency directors at DCRA and FEMS including staff that are involved with processing license, code violation inspection, as well as those individuals who were responsible for investigating the code violation inspection at 708 Kennedy.

A&M's approach, findings and observations, and recommendations are described in detail within the report below.

III. APPROACH

A. Introduction

In order to appropriately assess the actions taken by DCRA and FEMS in response to the violations reported by the MPD Officer at 708 Kennedy and to provide comprehensive recommendations regarding the policies and procedures for each of the District Agencies related to the licensing, inspection, and investigation of properties for code enforcement compliance, A&M did the following:

- Obtained and reviewed all relevant policies and procedures, including SOPs that were effective as of March 22, 2019, when the violations at 708 Kennedy were first reported to DCRA and FEMS, and any subsequent updates
- Reviewed email communications regarding the violations identified at 708 Kennedy and the actions taken leading up to the 708 Kennedy Fire
- Conducted fact-finding and investigative interviews of personnel at DCRA, FEMS, and MPD including agency leaders, staff involved with code violation inspections and regulatory investigations, as well as those individuals who had knowledge of and/or were specifically responsible for investigating the code violations reported at 708 Kennedy
- Researched practices in corresponding agencies in other metropolitan areas to inform recommendations

A&M then analyzed the information sources described above to 1) assess the actions taken by DCRA and FEMS in response to the reported violations, 2) identify gaps in the relevant policies and procedures that could leave the District and its residents vulnerable to future incidents similar to the 708 Kennedy Fire, and 3) provide recommendations to address the gaps identified.

B. Policies and Procedures

Given the focus of the SOW on how District Agencies respond to reported code violations, A&M's priority was to obtain and review guidance available under general District law as well as District Agencies' policies and procedures regarding reported code violations. While District of Columbia Code ("DC Code") and the District of Columbia Municipal Regulations ("DCMR") establish the relevant laws and regulations of the District, each agency establishes its own policies and procedures that enable it to carry out its mission in compliance with those laws and regulations.

The policies and procedures reflected in the tables below are listed chronologically. All policies and procedures issued subsequent to the 708 Kennedy Fire have been shaded grey. Please note that the policies and procedures are those that were provided by District Agencies in response to our data requests.

1. FEMS

FEMS issues General Orders affecting the permanent policy of the agency. The table below reflects those FEMS policies that are relevant to the identification and reporting of code violations.

Table 3 - FEMS Policies and Procedures Re: Code Violations

Ref.	Agency	Title	Summary	Date of Issue
1	FEMS	Administrative Search Warrant Handout	DC officials may apply for Administrative Search Warrant upon tenant refusal or after reasonable efforts to gain access on at least two documented occasions. Reference to D.C. SCR-Civil Rule 204 (2008).	4/2/1990
2	FEMS	GO 501 - Right to Entry	General Order - Members shall request permission to enter non-public areas and contact supervisor to seek an administrative search warrant upon refusal. A non-public area may be entered without consent or warrant when the member reasonably believes that exigent circumstances exist - life threatening conditions requiring immediate attention to prevent harm or death. Exigent conditions are those that are highly likely to cause fire or serious injury within minutes or hours.	10/1/2009
3	FEMS	GO 505 - Referral Procedures	General Order - Inspector shall determine the issue, document the issue (pictures, notes, reports, etc.), complete referral form (FEMS Form 29) and submit to supervisor, and send referral to appropriate agency after review. All referrals must have documentation to the fact that they have been transmitted and received by the other agency (fax confirmation, email confirmation).	10/1/2009
4	FEMS	GO 503 - Fire Inspection Procedures	General Order - Fire inspectors shall schedule all fire inspections in Zoll system within 72 hours of issuance from supervisor (complaint inspections shall be scheduled and completed on same date of receipt from supervisor) and complete a minimum of 6 fire inspections daily. Provides entry procedures, inspection and documentation procedures, and violation documentation and reporting procedures. All notices and orders are sent by certified mail.	4/1/2018

Ref.	Agency	Title	Summary	Date of Issue
5	FEMS	GO 506 - Administrative Search Warrant Procedures	General Order - Administrative Search Warrant can be obtained if consent to inspect is refused after two attempts to gain access or if the information provided is enough to believe that an offense has been committed and proof is documented. Affidavit for administrative search warrant must be reviewed by the Fire Prevention Division Supervisor and signed by an Office of the Attorney General ("OAG") attorney.	6/24/2018
6	FEMS	GO 503 - Fire Inspection Procedures	General Order – States that Fire inspectors shall schedule all fire inspections in the Zoll system within 72 hours of issuance from supervisor (complaint inspections shall be scheduled and completed on same date of receipt from supervisor). Provides entry procedures, inspection and documentation procedures, and violation documentation and reporting procedures. All notices and orders must be sent by certified mail. For all building inspections, Fire inspectors shall note in the comment section of the record that they have reviewed the building's fire protection records.	10/1/2018
7	FEMS	GO 505 - Referral Procedures	General Order - Inspector shall determine the issue, document the issue (pictures, notes, reports, etc.), complete referral form (FEMS Form 29) and submit to Inspections Supervisor for review and signature of approval, send referral to appropriate agency after review. All referrals must have documentation to the fact that they have been transmitted and received by the other agency (fax confirmation, email confirmation). The Inspection Supervisor will follow-up with the receiving agency within 2 hours to identify actions and findings and ensure the referral information is entered into Fire Records Management System. If there is immediate need for a representative from DCRA, Fire inspectors shall contact HSEMA.	8/23/2019

Ref.	Agency	Title	Summary	Date of Issue
8	FEMS	GO 502 - Complaint Procedures	General Order - Complaints will be forwarded to Administrative Assistant for logging/assignment and copied to Fire Marshal and Assistant Fire Marshal. The Administrative Assistant logs the complaint, assigns a tracking number, and forwards to Division Inspections Supervisor for inspector assignment. inspector must speak with complainant or inspect location within 24 hours or the next business day. Administrative assistant shall log completed report and forward copy to Fire Marshal / Assistant Fire Marshal.	8/23/2019
9	FEMS	GO 501 - Right of Entry	General Order - Members shall request permission to enter non-public areas and contact supervisor to seek an administrative search warrant upon refusal (GO 506). A non-public area may be entered without consent or warrant when the member reasonably believes that exigent circumstances exist - life threatening conditions requiring immediate attention to prevent harm or death. Exigent conditions are highly likely to cause fire or serious injury within minutes or hours. The Inspections Supervisor shall be notified of unsafe conditions.	9/22/2019

Prior to the Kennedy Fire, FEMS had several General Orders in effect that addressed the handling and referral of code violations including the right of entry to a property, fire inspection procedures, referral procedures, and administrative search warrant procedures. However, there were no General Orders that outlined how code violations should be managed by the agency.

In the weeks subsequent to the Kennedy Fire, FEMS revised three of its General Orders to provide more clarity and created a new General Order to address procedures around complaint processing.

2. MPD

The MPD issues written directives referred to as General Orders which include statements of policy and interpretations of policy. The table below reflects those MPD policies and procedures relevant to the identification and reporting of code violations. The MPD only has two policies that address the identification and reporting of code violations. The first is a General Order with an issue date of April 5, 2011, and the second is an Executive Order issued on September 3, 2019 (i.e., subsequent to the Kennedy Fire).

Table 4 - MPD Policies and Procedures Re: Code Violations

Ref.	Agency	Title	Summary	Date of Issue
1	MPD	GO 201.26 Article 22	General Order - MPD members must report to the appropriate government agency any violations of plumbing, building, or health codes encountered.	4/5/2011
2	MPD	EO 19-005	Executive Order - Effective immediately, when a member observes a serious fire code violation, immediately notify a supervisor who shall respond to the scene. The on-scene supervisor will notify FEMS Fire Liaison Officer through the Office of Unified Communications ("OUC") of the location and threat. Member shall send email to dcra@dc.gov, copying mpdcic@dc.gov, prior to end of shift and complete the appropriate field report.	9/3/2019

Prior to the Kennedy Fire, MPD's policies and procedures around the identification and reporting of code violations were vague. The guidance in effect on March 22, 2018, when MPD reported the violations to DCRA and FEMS, was General Order 201.26 (Duties, Responsibilities and Conduct of Members of the Department) issued on April 25, 2011.

Section V, Article 22 of General Order 201.26 outlines the roles of responsibilities of officers and states that MPD officers are to:

Report to the appropriate government agency any incidentals such as street lights out, traffic signs down, broken fire hydrants or dangerous roadway or sidewalk conditions.

a. Report any violations of plumbing, building or health codes to the appropriate agency.

b. Should the member be unable to identify the correct agency, he/she shall request that a notification be made to the Mayor's Command Center through the Command Information Center (CIC) or the OUC.

On September 3, 2019, in an effort to clarify the actions that an MPD officer should take when violations are identified, the MPD issued Executive Order 19-005 (Fire Code Violations) which also notes that the MPD is currently working with FEMS and DCRA on a new protocol for reporting and responding to potential fire code violations. The Executive Order further notes that, in the interim, members shall adhere to the new procedures contained in the order.

Executive Order 19-005 notes the following:

Effective immediately, when a member observes what appears to be a serious fire code violation (i.e., conditions that appear to present a serious hazard or possible life-safety threat), he or she shall notify a supervisor who shall respond to the scene.

- A. *The on-scene supervisor shall notify the FEMS Fire Liaison Officer (FLO) through the OUC of the location and potential life-safety threat.*
- B. *The member shall send an email to dcra@dc.gov, copying mpdcic@dc.gov, prior to the end of his or her shift that includes the location's address, an explanation of the alleged violation, and the associated CCN.*
- C. *In all cases, the member shall complete the appropriate field report and document notifications made in the internal narrative.*

FEMS leadership has noted to A&M that it has asked MPD to add the Fire Prevention Department inbox (fems.fireprevention@dc.gov) as a location to which MPD officers should also send complaints.

3. DCRA

A&M requested and received formalized policies and procedures from DCRA related to investigation and inspection of property code violations. The materials provided by DCRA also included informal procedures related to regulatory investigations that were communicated via emails to investigators. The table below reflects those DCRA policies and procedures (both formal and informal) relevant to the identification and reporting of code violations.

Table 5 - DCRA Polices & Procedures Re: Code Violations

Ref.	Agency	Title	Summary	Date of Issue
1	DCRA	Standard Operating Procedures: Generating Property Maintenance NOV and NOI	SOP establishes standards for generating Notice of Violation ("NOV") and Notice of Infraction ("NOI") for housing code violations, including NOV preparation by administrative staff, documentation, and approval.	10/25/2018
2	DCRA	Title 11, DCMR Zoning Regulations, Subtitle U-251	Provides a listing of uses permitted as home occupations. A Home Occupancy Permit (HOP) shall be required prior to the practice of a home occupation and shall comply with	10/26/2018

Ref.	Agency	Title	Summary	Date of Issue
			conditions and requirements. Provides a listing of uses prohibited as home occupations.	
3	DCRA	OCI FY2019	DCRA performance goals for FY2019 including benchmarks related to NOI reviewer efficiency, NOI service & record keeping, collections, FOIA, and professional development.	11/14/2018
4	DCRA	Investigative Report Submission Process	The report submission process will be streamlined via computer. All reports, photographs, complaints, etc. are uploaded to the computer and submitted for review via email. All reports will be reviewed within an hour of submission. The printing, signing, and submission of the final report should be done COB of the day the report was initially submitted for review.	12/17/2018
5	DCRA	New Forms	New forms related to witness statements for cases that involve an NOI and tenant statements related to rent paid for illegal rentals.	12/28/2018
6	DCRA	Email for Report Submission	The report submission process will be streamlined via computer. All reports, photographs, complaints, etc. are uploaded to the computer and submitted for review via email. All reports will be reviewed within an hour of submission. The printing, signing, and submission of the final report should be done by close of business of the day the report was initially submitted for review.	1/8/2019
7	DCRA	Habitability Customer Service Emergency Process	All correspondence involving emergencies (no heat, no utilities, flooding) must be assigned in the CRM to the appropriate email address. Emergency cases should be assigned to inspectors in time for inspectors to conduct inspection and return to office by 6pm. All after hours calls will be given to the DCRA Duty Officer to triage. Process provides criteria to determine if call qualifies as an emergency.	3/7/2019

Ref.	Agency	Title	Summary	Date of Issue
8	DCRA	Standard Operating Procedures: Scheduling and Conducting Inspections	SOP for scheduling property maintenance inspections, preparing and conducting property maintenance inspections, processing property maintenance NOV's, and preparation and movement of NOIs.	4/29/2019
9	DCRA	Standard Operating Procedures: Property Maintenance Unit Scheduling Initial Inspection v1	SOP providing detailed instructions for scheduling initial inspections as it relates to customer service and administrative staff receiving and triaging complaints. Inspections should be scheduled within 15 days, but no later than 30 business days.	5/1/2019
10	DCRA	Standard Operating Procedures: Property Maintenance Unit Scheduling Initial Inspection v2	SOP providing detailed instructions for scheduling initial inspections as it relates to customer service and administrative staff receiving and triaging complaints, as well as closing CRM tickets. Inspections should be scheduled within 15 days, but no later than 30 business days. Establishes procedures on evidentiary packet and closing CRMs.	8/13/2019
11	DCRA	Office of Consumer Protection Closure Letters	Prior to closure letters for Office of Consumer Protection ("OCP") cases, notify the complainant that the case is being closed, send an email to the complainant with the formal closure letter and place correspondence in file, place a sticky note on the case file to inform the DCRA Investigations Intake Analyst that the letter is enclosed, and the DCRA Investigations Intake Analyst will mail the letter to the complainant.	8/16/2019
12	DCRA	Rental Property Complaints	Complaints are entered by the complainant in QuickBase or received by DCRA and immediately logged into QuickBase Consumer Complaints System. Once complaint is assigned to investigator, the investigator must gather all pertinent information about location, owner, and tenants prior to visiting the property. investigator should document the visit, front and rear, speak with neighbors, attempt to get a signed statement from the tenant, and leave business card. Upon the	8/26/2019

Ref.	Agency	Title	Summary	Date of Issue
			determination that the unit is being rented, the case should be referred to DCRA Inspections and Compliance Division for an inspection of the premises.	
13	DCRA	Rental Property Complaints	Complaints are entered by the complainant in QuickBase or received by DCRA and immediately logged into QuickBase Consumer Complaints System. Once complaint is assigned to investigator, the investigator must gather all pertinent information about location, owner, and tenants prior to visiting the property. investigator should document the visit, front and rear, speak with neighbors, attempt to get a signed statement from the tenant, and leave business card. Upon the determination that the unit is being rented, the case should be referred to DCRA Inspections and Compliance Division for an inspection of the premises.	8/26/2019
14	DCRA	Standard Operating Procedures: Office of Civil Infractions	SOP establishing standards for reviewing NOIs, ensuring proper retention of records, filing NOIs, billing of special assessments, placement of liens for fines, and payment processing of fines and special assessments.	8/29/2019
15	DCRA	Standard Operating Procedures: Property Maintenance Unit Scheduling Initial Inspection v3	SOP providing detailed instructions for scheduling initial inspections as it relates to customer service and administrative staff receiving and triaging complaints, as well as closing CRMs. Inspections should be scheduled within 15 days, but no later than 30 business days. SOP has been updated to include a step requiring processing team member to search ACCELA records to determine if property is a licensed rental property.	9/3/2019
16	DCRA	Process	All IR ("Investigations Request") complaints must be submitted through QuickBase, with attachments included. Once the documents have been uploaded to QuickBase, the status should be updated to "ready for review" and an email	9/10/2019

Ref.	Agency	Title	Summary	Date of Issue
			should be sent to the Program Officer notifying him that the IR is in QB.	
17	DCRA	Closing Cases in QB	Once the investigation report has been submitted for review, the case should NOT be closed in QuickBase. Only DCRA Intake Investigations Intake Analyst and DCRA Intake Investigator have the authority to close cases in QuickBase.	9/10/2019
18	DCRA	Standard Operating Procedures: Consumer Protection Unit	SOP for complaint intake, case assignment, investigation and case closure, pre-license and license referrals, residential property complaints, and quality control.	9/13/2019
19	DCRA	Duty Officer: Closing Units/Displacing Tenants	After a unit/building is closed and tenants are displaced due to DCRA actions, the Administrative Officer is responsible for sending an after-action report to the director informing of actions taken, justification of actions, and the outcome.	9/16/2019
20	DCRA	Update to Scheduling Process	When scheduling an inspection where a tenant is involved, all administrators must first search ACCELA, DCRA's permitting and licensing system for an active BBL to confirm that an inspection has occurred. If there are no inspections under the address, that is an indication that the property is not licensed.	9/17/2019
21	DCRA	Standard Operating Procedures: Regulatory Investigations Section	SOP providing detailed instructions for receiving complaints about licensed, unlicensed businesses, investigating complaints about businesses, conducting background investigations, surveys, personal service, and enforcing the rules and regulations of the District.	Not Formally Distributed
22	DCRA	Standard Operating Procedures: Inspections and Compliance Administration/Duty Officer	SOP establishing consistent process for DCRA Duty Officers when responding, detailing that DCRA Duty Officers should be contacted through HSEMA 24-hour operations center, but may be dispatched by DCRA senior management. Duty Officers should notify Deputy Chief Building Officer ("CBO") that they are responding to the incident, fully document the conditions found, and have abatement occur as early as 24	Not Formally Distributed

Ref.	Agency	Title	Summary	Date of Issue
			hours or at a maximum of 72 hours. The DCRA Duty Officer is responsible to ensure that appropriate follow up actions occur.	

DCRA began formalizing the inspection and investigation procedures around code violations in late 2018. Over the course of the following year, DCRA attempted to standardize many of its processes through formal SOPs and informal memos. Many of the documents provided by DCRA were not drafted or distributed until after the Kennedy Fire.

C. Interviews

In accordance with the SOW, A&M interviewed agency leaders at DCRA, FEMS, and MPD. In addition, A&M identified individuals at each of the agencies that could speak to the policies and procedures in place as of the date of the 708 Kennedy Complaint through the date of the 708 Kennedy Fire. A&M also interviewed DCRA, FEMS, and MPD personnel who were directly involved with the response to the reported violations at 708 Kennedy. In total, A&M interviewed 26 DCRA, FEMS, and MPD personnel.

1. FEMS

The table below reflects the positions of the FEMS personnel interviewed by A&M.

Table 6 - FEMS Interview List

Ref	Agency	Title
1	FEMS	Chief
2	FEMS	Chief of Staff
3	FEMS	Deputy Fire Chief/ Fire Marshal
4	FEMS	Assistant Fire Chief, Technical Services
5	FEMS	Lieutenant - Technical Section
6	FEMS	Lieutenant - Administrative Officer

BETWEEN DCRA, FEMS, AND MPD

A&M interviewed the relevant individuals, as identified by FEMS, who could speak to FEMS policies and procedures regarding reported code violations. A&M discussed policies and procedures utilized by FEMS in tracking and responding to complaints received as well as communications with other agencies.

A&M also interviewed two individuals currently placed on administrative leave who were directly involved in the handling of the reported violations at 708 Kennedy – a Lieutenant in FEMS Technical Section who was included on the original March 22 email sent by the MPD Officer and the FEMS Inspections Lieutenant to whom the email was forwarded for assignment to a Fire inspector. A&M utilized these interviews to gain further understanding of the policies and procedures as understood by these employees and to gain further understanding of FEMS' response to the violations reported at 708 Kennedy.

2. MPD

The table below reflects the positions of the MPD personnel interviewed by A&M.

Table 7 - MPD Interview List

Ref	Agency	Title
1	MPD	Chief of Staff
2	MPD	MPD Director of Strategic Change
3	MPD	Fourth District Commander
4	MPD	MPD Officer - 4th District

Given that MPD does not have responsibility for responding to code violations, A&M interviewed MPD personnel to gain an understanding of the role of the MPD in the identification of code violations and communications with the respective District agencies and to understand MPD's expectations regarding follow-up from those agencies.

A&M also interviewed the MPD Officer who reported the violations to various personnel within DCRA and FEMS to gain a further understanding of the events that resulted in responding to 708 Kennedy, how the individuals at DCRA and FEMS to whom the March 22, 2019 email was sent were identified, and any subsequent follow-up made to or received from the agencies.

3. DCRA

Given the nature of the violations and the several attempts by the MPD Officer to interface with DCRA that went unanswered, A&M interviewed many more personnel at DCRA than other District Agencies. The table below reflects the DCRA personnel interviewed by A&M.

Table 8 - DCRA Interview List

Ref	Agency	Title
1	DCRA	DCRA Director
2	DCRA	DCRA Deputy Director
3	DCRA	Chief Administrative Officer
4	DCRA	Senior Policy Advisor
5	DCRA	Interim Chief Building Official
6	DCRA	Program Officer, Regulatory Investigations Section
7	DCRA	Administrative Officer, Chief Building Official
8	DCRA	Program Manager, Civil Infractions
9	DCRA	Program Analyst, Regulatory Investigations Section
10	DCRA	Program Manager - Inspections
11	DCRA	Investigator, Regulatory Investigations Section
12	DCRA	Deputy Zoning Administrator
13	DCRA	Chief Information Officer
14	DCRA	Community Outreach Specialist
15	DCRA	Investigator, Regulatory Investigations Section
16	DCRA	Investigator, Regulatory Investigations Section

We conducted these interviews to gain an understanding of the policies and procedures in place at the time the incident was first reported on March 22, 2019 and any changes made subsequent to that date including changes made as a result of the 708 Kennedy Fire. Many on the DCRA leadership team including the Director, Deputy Director, and Chief Administrative Officer have been with DCRA less than one year

and were in the process of making significant changes to the way DCRA operated prior to the 708 Kennedy Fire.

A&M spoke to individuals who were included on the March 22, 2019 email from the reporting MPD Officer, the DCRA Duty Officer to whom that email was forwarded (currently on administrative leave), and the individuals with whom the MPD Officer followed up on multiple occasions over the course of three months including the DCRA 708 Investigator (currently on administrative leave). A&M's goal was to gain further understanding of the reason for the actions taken/not taken by each of these employees as well as to gain an understanding of the official and unofficial policies and procedures in use by DCRA.

A&M also interviewed individuals at DCRA who could speak about the systems used by licensing, investigations, and inspections teams and received a walkthrough of each of these systems including the ACCELA⁵ database and two QuickBase applications - the Pilot CRM and the Consumer Complaints Database ("Investigations Module").⁶ Finally, given the fact that many of the procedures followed by investigators prior to the 708 Kennedy Fire were distributed through informal means, A&M interviewed two additional investigators to verify and confirm the understanding of the investigations process described by the DCRA 708 Investigator who was assigned to the 708 Kennedy complaint.

4. OCTO

In addition to the District Agency interviews outlined above, A&M met with Office of the Chief Technology Officer ("OCTO") personnel to gain access to information about systems and communications.

Table 9 - OCTO Interview List

Ref	Agency	Title
1	OCTO	Citywide Messaging Architect
2	OCTO	Director
3	OCTO	OCTO General Counsel
4	OCTO	OCTO Telecommunications Governance Manager
5	OCTO	Messaging Specialist

⁵ DCRA's permitting and licensing system.

⁶ The Investigations Module is utilized by the Investigations team to track investigation progress.

D. Communications and Document Review

In addition to performing interviews of key personnel, A&M obtained and reviewed documents and communications from each of the District Agencies related to the code enforcement process and the events leading up to the 708 Kennedy Fire. Additionally, some of the requests to the District Agencies were satisfied by documents provided to A&M via the OCA and OCTO.

1. Email Communications

A&M obtained emails related to 708 Kennedy from the District Agencies with assistance from OCTO. OCTO is the central technology organization of the DC Government, responsible for establishing technology policies for the District and providing technology services and support for the District Agencies.

A&M received multiple email productions based on targeted searches across DCRA, FEMS and MPD email accounts initiated by various parties within the District Agencies and other DC Government agencies attempting to gain an understanding of the events leading up to the 708 Kennedy Fire.

2. FEMS

A&M requested the following documents and communications from FEMS:

- All versions (originals and updates/modifications) of relevant FEMS policies, procedures, rules, and regulations in place related to the fire incident at 708 Kennedy Street in place from March 2019 to present day.
- Communications to FEMS staff regarding new policies and/or required trainings
- All investigation reports prepared by and supporting data collected by FEMS related to 708 Kennedy.
- All communications regarding 708 Kennedy from March 1, 2019, to August 22, 2019, sent or received by all FEMS employees.
- All communications regarding code violations from March 1, 2019, to August 22, 2019, sent or received by key FEMS personnel associated with 708 Kennedy.
- Any “lessons learned” documentation or investigation reports related to 708 Kennedy.

3. MPD

A&M requested the following documents and communications from MPD:

- All versions (originals and updates/modifications) of relevant MPD policies, procedures, rules, and regulations in place related to the fire incident at 708 Kennedy Street in place from March 2019 to present day.
- Communications to MPD staff regarding new policies and/or required trainings.

BETWEEN DCRA, FEMS, AND MPD

- All investigation reports prepared by and supporting data collected by MPD related to 708 Kennedy.
- All communications regarding 708 Kennedy from March 1, 2019, to August 22, 2019, sent or received by all MPD employees.
- All communications from March 1, 2019, to August 22, 2019, sent or received by the reporting officer.
- Any “lessons learned” documentation or investigation reports related to 708 Kennedy.
- MPD data related to the initial request for service on March 22, 2019.
- 708 Kennedy PIR dated March 22, 2019.
- Body-worn camera (BWC) footage from the reporting officer’s initial visit to 708 Kennedy on March 21, 2019.

4. DCRA

A&M requested the following documents and communications from DCRA:

- All versions (originals and updates/modifications) of relevant DCRA policies, procedures, rules, and regulations in place related to the fire incident at 708 Kennedy Street in place from March 2019 to present day.
- Communications to DCRA staff regarding new policies and/or required trainings.
- All investigation reports prepared by and supporting data collected by DCRA related to 708 Kennedy.
- All communications regarding 708 Kennedy from March 1, 2019, to August 22, 2019, sent or received by all DCRA employees.
- All communications regarding code violations from March 1, 2019, to August 22, 2019, sent or received by key DCRA personnel associated with 708 Kennedy.
- Any “lessons learned” documentation or investigation reports related to 708 Kennedy.
- DCRA data, documents, communications, photos, memos, and records related to property inspections at 708 Kennedy.
- Job descriptions for all personnel who should have had a role in the handling of violations at 708 Kennedy.
- DCRA timeline that demonstrates the order of operations for emergency and standard inspection requests.
- Data regarding the number of new inspections and investigations reported to and addressed by DCRA on a monthly basis.
- Data regarding the number of inspections vs. investigations completed by DCRA, including the resulting outcome.
- Any Inspector General reports on the operations of DCRA within the previous five years.

- Statistics on the number of housing units and businesses within DCRA's jurisdiction.
- Any performance improvement initiatives/reports completed over the previous five years.
- All photos of 708 Kennedy taken by the assigned DCRA 708 Investigator.
- The audit log of activities associated with 708 Kennedy within the 3 IT systems (Pilot CRM, Investigations module, and ACCELA).
- Text Messages of DCRA 708 Investigator.

5. Missing or Unavailable Documents

The District Agencies were not able to produce all documents requested by A&M related to A&M's review and investigation of the code enforcement process and events leading up to the 708 Kennedy Fire. Based on discussions with employees of the District Agencies, the documents were not produced because they either do not exist or reportedly existed but cannot be located. A&M was not able to obtain and review the following documents as part of our review and investigation of the District's Code Enforcement Process:

- *DCRA data, documents, communications, memos, and records related to property inspections at 708 Kennedy* - DCRA reported to A&M that these records do not exist as an inspector never visited 708 Kennedy in response to the 708 Kennedy Complaint.
- *The audit log of activities associated with 708 Kennedy within DCRA's Pilot CRM and Investigations module* - This item does not exist as DCRA's Pilot CRM and Investigations Modules do not have the functionality to provide an audit log. OCTO provided data reflecting the first and last changes made in these systems regarding the 708 Kennedy property.
- *All investigation reports prepared by and supporting data collected by DCRA related to the fire at 708 Kennedy* - DCRA reported to A&M that these items do not exist.
- *Body-worn camera (BWC) footage from the MPD Officer's initial visit to 708 Kennedy on March 21, 2019* – OCA and MPD were unable to provide the BWC footage as it is part of an ongoing criminal investigation.
- *Text Messages of DCRA 708 Investigator* - DCRA reported to A&M that it attempted to, but was unable to retrieve, these messages from the DCRA 708 Investigator's government-issued cell phone.

DCRA has only been able to provide limited documentation related to the investigation of reported code violations at 708 Kennedy (including photos of the front of the property taken on May 22). **A&M has not received any communications, reports, memos, or other documentation corroborating the investigation performed by the DCRA 708 Investigator into the reported code violations at 708 Kennedy.** DCRA reported to A&M that all available information has been provided. The DCRA 708 Investigator reported to A&M that some of these items did exist in hardcopy form but were lost during an office move.

IV. FINDINGS & OBSERVATIONS

A. Introduction

The following section outlines A&M's Key Findings and Observations related to the series of events and communications leading up to the 708 Kennedy Fire. The *Key Findings* section highlights nine instances in which District Agencies did not properly execute the responsibilities, procedures, or policies associated with key roles. These Key Findings constitute the most critical violations, that, if handled differently, could have impacted the likelihood of the 708 Kennedy Fire. The *Observations* section details underlying issues which have contributed to or could contribute to failure to remedy unsafe buildings. A&M has identified recommended actions to address the listed Key Findings and Observations later in the *Recommendations* section.

B. Key Findings

A&M has identified Key Findings related to the 708 Kennedy Fire, and integrated the identified failure points in chronological order on the timeline of events below.

BETWEEN DCRA, FEMS, AND MPD

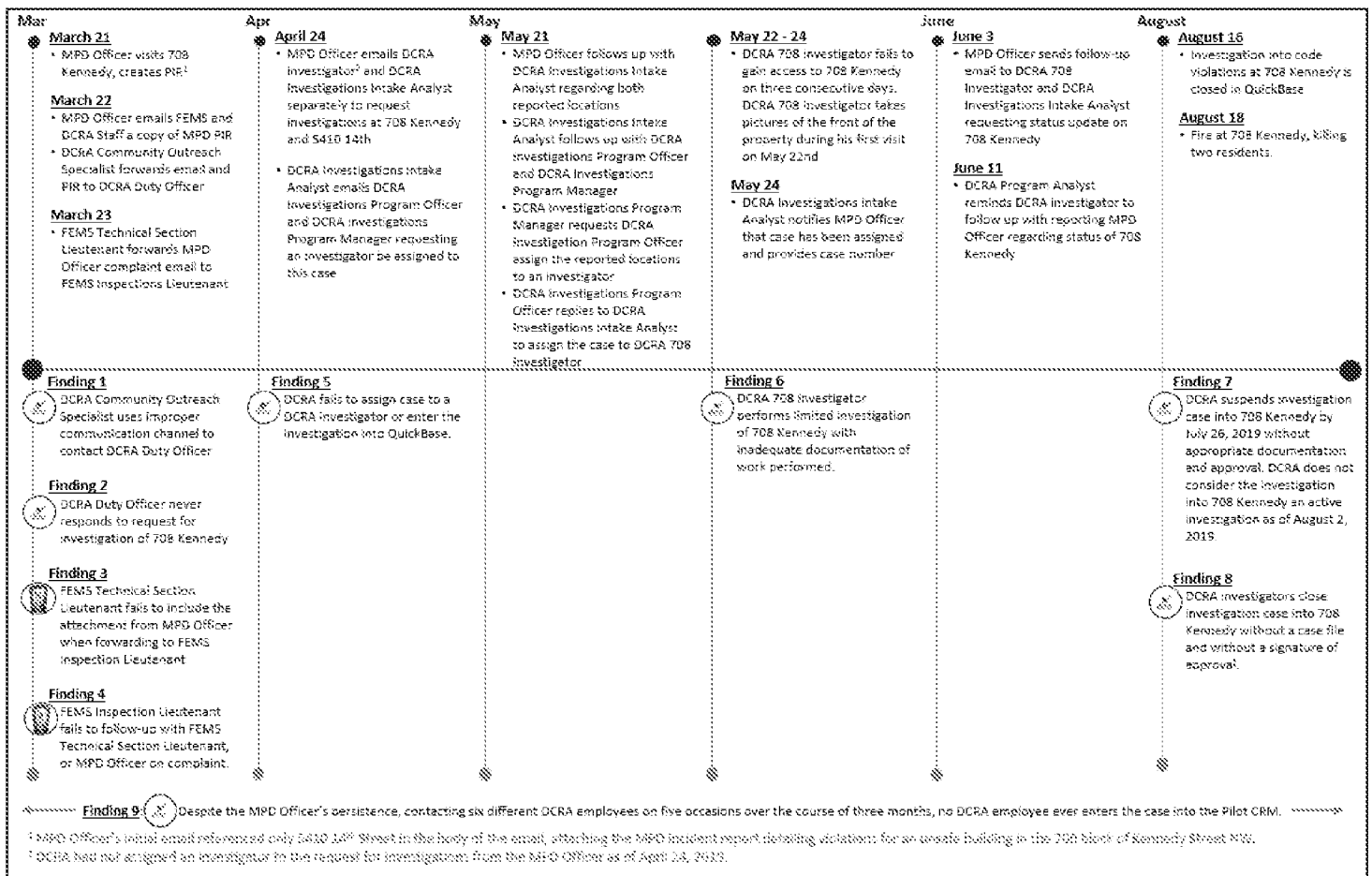


Figure 2: Critical Events Related to 708 Kennedy Fire with Key Findings

1. March 22, 2019 – DCRA Community Outreach Specialist uses improper communication channel to contact the DCRA Duty Officer. As a result, the DCRA Duty Officer never responds to the scene. DCRA does not enter reported code violations into the Pilot CRM.

On the night of March 22, 2019, the MPD Officer sent an email with subject line “Serious Code Violations” to two employees of FEMS and four employees of DCRA. The MPD Officer attached to the email the PIR related to 708 Kennedy which was completed the previous night on March 21, 2019. Upon receipt of the email, the DCRA Community Outreach Specialist forwarded the message to the on-duty DCRA Duty Officer and replied to the MPD Officer’s email, with all other recipients copied, stating that the request had been forwarded to the Duty Officer. The Duty Officer is DCRA’s primary agency contact responsible for responding to after hour and weekend urgent incidents.

According to interviews with the CBO and review of the SOP for the Duty Officer, it is outside of the SOP for a Duty Officer to receive emergency requests via written requests. This expectation is found in Section III, Policy B of the SOP for the Duty Officer which states that, "All emergency requests for after-hours DCRA assistance should be routed through the Homeland Security and Emergency Management Agency 24-hour Operations Center." DCRA protocol requires that all Duty Officer schedules and phone numbers are shared with the HSEMA team and Duty Officers are not provided a separate email account to monitor.

The DCRA Duty Officer at the time was therefore not monitoring the email traffic associated with normal work email when the DCRA Duty Officer received the request from the DCRA Community Outreach Specialist close to midnight on March 22, 2019. As described further in Finding 9, the DCRA Community Outreach Specialist and three other DCRA employees included on the initial email from the MPD Officer failed to enter the complaint into DCRA's Pilot CRM or record the need for action in any system or log.

The DCRA Community Outreach Specialist's failure to route the information via HSEMA for an urgent request was DCRA's first failure to properly report, respond to, and address the unlicensed rooming house and unsafe conditions reported at 708 Kennedy.

2. Post-March 22, 2019 – DCRA Duty Officer never responds to request for investigation of 708 Kennedy.

As described above, the DCRA Duty Officer on call on the evening of March 22, 2019 did not see the email that was forwarded by the DCRA Community Outreach Specialist. Per the SOP, the Duty Officer is expected to respond to phone call requests from HSEMA and is not expected to monitor email traffic for emergencies.

Although in accordance with Duty Officer SOPs, the DCRA Duty Officer was not expected to respond to emails outside of normal working hours, the DCRA Duty Officer (also the DCRA Housing Inspection Program Manager) failed to react to the request on Monday, March 25, 2019, or any date after that, when the DCRA Duty Officer resumed the regular duties of DCRA Housing Inspection Program Manager. Any DCRA inspector, including the Housing Inspection Program Manager, has a duty under DCMR⁷ to respond

⁷ 12A DCMR § 115.2: Examination and Record of Damaged Structure. The code official shall examine every premises, including any building or other structure, reported as dangerous, unsafe structurally, or constituting a fire hazard, and shall maintain a record of unsafe premises, including any buildings or other structures, stating the use of the structure, and the nature and estimated amount of damages, if any, caused by collapse or failure.

12A DCMR § 115.3: Notice of Unsafe Structure or Equipment. If any unsafe condition is found, the code official shall serve a written notice that describes the condition, identifies the structure or equipment deemed unsafe, and specifies the required repairs or improvements to be made to abate the unsafe condition or requires the unsafe structure to be taken down and removed within a stipulated time.

to any building reported as dangerous. In an interview with A&M, the DCRA Duty Officer did not recall receiving the email from the DCRA Community Outreach Specialist, seeing it for the first time after the fire occurred. According to the DCRA Duty Officer, the high volume of email requests received prevented response to the request made by the MPD Officer. The DCRA Duty Officer also stated that the email that was forwarded did not indicate that there was an urgent issue to respond to and was outside of the realm of responsibilities because it dealt with the business licenses associated with that property, which is an Investigations issue. A&M's review found the complaint to meet the criteria outlined by DCMR requiring inspection by DCRA.

The DCRA Duty Officer's failure to act on a report that indicated 708 Kennedy was unsafe, and failure to route the provided information into DCRA's system for review was DCRA's second failure to properly report, respond to, and address the unlicensed rooming house and unsafe conditions reported at 708 Kennedy.

3. March 23, 2019 – FEMS Technical Section Lieutenant fails to include the attachment from reporting MPD Officer when forwarding to FEMS Inspection Lieutenant

On the night of March 22, 2019, the FEMS Technical Section Lieutenant received the initial outreach request from the MPD Officer. On the morning of March 23, 2019, the FEMS Technical Section Lieutenant forwarded the email reply from the DCRA Community Outreach Specialist to the FEMS Inspection Lieutenant. Because the FEMS Technical Section Lieutenant forwarded the reply from the DCRA Community Outreach Specialist, rather than forwarding the original email from the MPD Officer, the PIR was not included in the forwarded email to the FEMS Inspection Lieutenant.

As a result, the forwarded email received by the FEMS Inspection Lieutenant only referenced information regarding the potential of an unlicensed rooming house at "5410 14th Street."⁸ The FEMS Inspection Lieutenant then assigned only the "5410 14th Street" property referenced in the body of the email to an inspector.

⁸ Note: MPD Officer's initial report to DCRA and FEMS was communicated via email, which identified "Serious Code Violations" as the subject – the body of the email identified the address "5410 14th Street" and included an attached MPD incident Report which included details of violations in the 700 block of Kennedy, including: "violations by Fire Code and DCRA housing code violations"... "No Lighted Exited Signs; Fire Exit and the one Fire extinguisher was not tagged; no working smoke detectors. There are too many make shift doors with locks which would make it difficult to exit in an emergency." This email included a typo on the address of 5410 14th Street, this address was later determined to have been 5310 14th Street, NW.

The FEMS Technical Section Lieutenant's failure to forward the original email with PIR attached was FEMS' first failure to properly report, respond to, and address the unlicensed rooming house and unsafe conditions reported at 708 Kennedy.

4. Post March 23, 2019– FEMS Inspection Lieutenant fails to follow-up with FEMS Technical Section Lieutenant or MPD Officer on complaint. Ultimately takes no action to resolve complaint until after the 708 Kennedy Fire.

When the FEMS Inspection Lieutenant received the forwarded email from the FEMS Technical Section Lieutenant, the only information included (due to the omission of the attachment) referenced a reported rooming house with no Certificate of Occupancy ("CofO") at "5410 14th Street." The FEMS Inspection Lieutenant could not recall whether or not a FEMS inspector reported to the property. Neither the FEMS Inspection Lieutenant nor any FEMS inspector took further action on the matter. FEMS did not contact the complainant (the MPD Officer) or the FEMS Technical Section Lieutenant who forwarded the complaint to verify details of the complaint. FEMS was unable to demonstrate any further action taken until after the 708 Kennedy Fire.

Though the forwarded email received by the FEMS Inspection Lieutenant did not have the PIR attached, the text of the email implied that there were multiple locations that required attention. The subject of the email reads "Serious Code Violations" and the text of the email reads "I also need an inspection of a dwelling residence located at 5410 14th Street...", implying that there was at least one other property needing the attention of FEMS.

In the aftermath of the 708 Kennedy Fire, the FEMS Inspection Lieutenant acknowledged that if FEMS had followed up with the MPD Officer regarding the "5410 14th Street" report, they may have identified and appropriately addressed fire safety concerns at 708 Kennedy.

An additional consideration related to this finding: The FEMS requirement for documentation of inspection activity stipulates that inspection activity is logged upon inspection completion. Because 708 Kennedy and 5410 14th Street were never inspected, the FEMS Inspection Lieutenant could provide no documentation demonstrating the complaint was assigned to a FEMS inspector or any inspection files, or evidence that an inspection was ever conducted or completed. Therefore, A&M was unable to determine whether an FEMS inspector had been assigned.

The FEMS Inspection Lieutenant's failure to follow-up with either the reporting MPD Officer or the FEMS Technical Section Lieutenant was FEMS' second failure to properly report, respond to, and address the unlicensed rooming house and unsafe conditions reported at 708 Kennedy.

5. April 24, 2019 –DCRA fails to assign case to a DCRA Investigator or enter the investigation into QuickBase

On April 24, 2019, the MPD Officer sent a second request to the DCRA Program Analyst asking for an investigation of the properties located at 708 Kennedy and 5410 14th Street. In the email with subject: “Investigator”, the MPD Officer indicated that both properties had issues related to Certificates of Occupancy. The MPD Officer also requested an update on the two properties once the investigations were concluded. Upon receipt of the email, the DCRA Investigations Intake Analyst conducted a search of the Investigation Module and found that there were no open investigations for either address.

Shortly after receiving the request from the MPD Officer, the DCRA Investigations Intake Analyst forwarded the request to the DCRA Investigations Program Officer and DCRA Investigations Program Manager⁹ so that the cases could be assigned to an investigator. At this time, there is no evidence that either the DCRA Investigations Program Manager or DCRA Investigations Program Officer replied to this information and no investigator was assigned. Between April 24, 2019 and May 22, 2019 there was no action taken on 708 Kennedy.

The DCRA Investigations Program Officer’s and DCRA Investigations Program Manager’s failure to monitor and respond to the April 24, 2019 investigation request was DCRA’s third failure to properly report, respond to, and address the unlicensed rooming house and unsafe conditions reported at 708 Kennedy.

6. May 22 – 24, 2019 – DCRA 708 Investigator performs limited investigation of 708 Kennedy with inadequate documentation of work performed

On May 21, 2019, the DCRA Investigations Program Manager assigned the DCRA 708 Investigator via email to investigate 708 Kennedy after the MPD Officer followed up for a third time. The DCRA 708 Investigator failed to adequately investigate or document the case in line with DCRA best practices:

- The DCRA 708 Investigator stated that the DCRA 708 Investigator attempted to traveled to 708 Kennedy on three consecutive days (May 22, May 23, and May 24, 2019) and failed to gain access to the property. The DCRA 708 Investigator took pictures during the first visit on May 22, 2019 but could not provide documentation demonstrating that the attempts access the property on the other stated dates.
- The pictures taken of 708 Kennedy on May 22, 2019 depict the front of the house. Conversations with other DCRA investigators indicated that it is a best practice to take photos of all publicly-

⁹ When forwarding this request, the Program Analyst communicated the corrected address of 5310 14th street NW.

accessible portions of a property including the rear facing side of a property and of any specific evidence that would indicate a violation of any kind.

- At no point prior to, during, or after the investigation did the DCRA 708 Investigator attempt to contact the MPD Officer who generated the PIR. The DCRA 708 Investigator failed to follow up with the MPD Officer despite a specific request from the MPD Officer on June 3, 2019, and a follow-up email on June 11, 2019 from the DCRA Investigations Intake Analyst reminding him to follow up with the MPD Officer.
- The DCRA 708 Investigator stated that the DCRA 708 Investigator created a case file for 708 Kennedy but that the case file was lost when parts of DCRA physically moved office spaces in August of 2019.
- The DCRA 708 Investigator failed to create a record of 708 Kennedy in the Pilot CRM or QuickBase System despite clear instructions to use the system beginning in February 2019.
- The DCRA 708 Investigator failed to note any observations regarding 708 Kennedy in the QuickBase System and the property was not tracked in the Investigations Module until June 12th when it was entered into the system by the DCRA Investigations Program Officer.
- The DCRA 708 Investigator made no attempt to obtain an administrative search warrant for 708 Kennedy despite the firsthand account provided by the MPD Officer in the PIR and history of maintenance, safety, and unlicensed rooming house complaints at 708 Kennedy provided in ACCELA.¹⁰
- In an interview with A&M, the DCRA 708 Investigator stated that the DCRA 708 Investigator sent a letter to the owner and left a business card on the door of 708 Kennedy. However, there is no evidence that the DCRA 708 Investigator made these attempts in DCRA's systems of record and no evidence that the DCRA 708 Investigator was able to contact the tenants living on the property or nearby neighbors.

The DCRA 708 Investigator's failure to properly conduct and document the investigation into the unlicensed housing complaint related to 708 Kennedy was DCRA's fourth failure to properly report, respond to, and address the unlicensed rooming house and unsafe conditions reported at 708 Kennedy.

7. July 26, 2019 – DCRA suspends the investigation into 708 Kennedy by July 26, 2019, without appropriate documentation and approval. DCRA does not consider the investigation into 708 Kennedy an active investigation as of August 2, 2019

In June 2019, the DCRA Investigations Program Officer was promoted to act as DCRA Investigations Program Manager. According to the DCRA Investigations Program Officer, the workload of the new position was so overwhelming that the DCRA Investigations Program Officer asked the DCRA 708

¹⁰ A&M has included a summary of the ACCELA event history for 708 Kennedy in *Appendix A*.

Investigator to assist with the administration of investigations, promoting the DCRA 708 Investigator to “Lead Investigator.” The created Lead Investigator position is not an official position within DCRA and did not have an SOP at the time of the 708 Kennedy Fire. There is not an SOP for the Lead Investigator position in DCRA’s new Consumer Protection Agency SOP released on September 24, 2019. As a result of the new duties associated with the Lead Investigator role, the DCRA 708 Investigator was not actively investigating 708 Kennedy. During this time, the DCRA Investigations Program Officer and DCRA 708 Investigator tracked investigations in an offline spreadsheet, allowing the DCRA Investigations Program Officer and DCRA 708 Investigator to suspend and close cases without oversight.

On July 26, 2019, the DCRA Investigations Program Officer and DCRA 708 Investigator agreed to suspend the investigation into 708 Kennedy without any documentation of approval or the reason for suspension. One week later, on August 2, 2019, the DCRA Investigations Program Officer identified the investigation of 708 Kennedy as an investigation that should not be included in the count of open investigations for DCRA’s report of open consumer complaints, effectively counting the investigation as closed in performance metrics without authorization or documentation.

DCRA’s actions to mark an open case as suspended without meeting any criteria for documentation or approval allowed the 708 Kennedy issue to go unaddressed from at least July 26 until August 16, 2019. The suspension of the investigation into 708 Kennedy was DCRA’s fifth failure to properly report, respond to, and address the unlicensed rooming house and unsafe conditions reported at 708 Kennedy.

8. August 16, 2019 – DCRA closes investigation case into 708 Kennedy without a case file and without a signature of approval

According to the DCRA Investigations Program Officer, on August 16, 2019 the 708 Kennedy Investigation was closed by the DCRA 708 Investigator overseeing the case, despite the issues highlighted in *Finding 6*. The DCRA 708 Investigator, and the DCRA Investigations Program Officer overseeing the case at the time, agreed (verbally) to close the case despite a lack of a case file and any supporting evidence gathered during the investigation, as required by internal documents.¹¹

The DCRA 708 Investigator’s failure to properly document the investigation of 708 Kennedy, and the DCRA Investigations Program Officer’s failure to appropriately review and validate completion of the investigation was DCRA’s sixth failure to properly report, respond to, and address the unlicensed rooming house located at 708 Kennedy.

¹¹ Per DCRA memo dated December 17, 2018 titled “Investigative Report Submission Process” outlined a detailed process for documenting all reports.

9. Despite the MPD Officer's persistence, contacting six different DCRA employees on five occasions over the course of three months, no DCRA employee ever entered the case into the Pilot CRM

On February 14, 2019, DCRA rolled out its new Pilot CRM system. With the rollout of the new system, DCRA communicated the expectation that all customer inquiries and complaints would be tracked through the centralized system to ensure expedient response and accountability throughout the agency. DCRA did not instruct employees to use redundant recording/communications methods to ensure continuity and, as such, designated the Pilot CRM as the system of record. Prior to the 708 Kennedy Fire, DCRA staff were unclear on the expectations or requirements associated with using the Pilot CRM. As a reflection of this lack of clarity, even the Community Outreach Specialist (who was named in rollout communications as a member of the "account management team" responsible for routing inquiries through the system) failed use the system to log the complaint related to 708 Kennedy.

Between March 22, 2019, and June 3, 2019, the MPD Officer communicated via email five times with six different members of DCRA requesting that investigators be sent to 708 Kennedy. Please see the details of those calls below:

- March 22, 2019: MPD Officer emails DCRA staff with email subject: "Serious Code Violations." DCRA Staff recipients include: a DCRA Business Licensing Specialist, a DCRA Program Manager, a DCRA Business License Manager, and the DCRA Community Outreach Specialist. None of the emailed DCRA staff member enters the request for an investigation at either property into the Pilot CRM.
- April 18, 2019: MPD Officer emails a DCRA investigator (not the DCRA 708 Investigator) requesting that investigators be sent to 708 Kennedy and 5410 14th Street. The MPD Officer makes this request after first requesting business license information related to multiple businesses in the District. Though the DCRA investigator states that the MPD Officer should direct this request to the intake officer, the DCRA investigator does not enter the request into the Pilot CRM.
- April 24, 2019: MPD Officer emails the DCRA Investigations Intake Analyst requesting that an investigator respond to 708 Kennedy and 5410 14th Street. Though the DCRA Investigations Intake Analyst checks to see if there are open cases at the two properties and forwards the request to the DCRA Investigations Program Officer and DCRA Investigations Program Manager, the DCRA Investigations Intake Analyst does not enter it into the Pilot CRM. The DCRA Investigations Program Manager and DCRA Investigations Program Officer also do not enter the request into the Pilot CRM.
- May 21, 2019: MPD Officer emails the DCRA Investigations Intake Analyst to follow up on the initial request for an investigation at 708 Kennedy and 5410 14th Street. Though the DCRA Investigations Intake Analyst follows up with the DCRA Investigations Program Officer and DCRA Investigations Program Manager, which leads to the case being assigned to the DCRA 708

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Investigator, the DCRA Investigations Analyst does not enter it into the Pilot CRM. Neither the DCRA Investigations Program Manager, the DCRA Investigations Program Officer, or the assigned DCRA 708 Investigator enter the request into the Pilot CRM.

- June 3, 2019: After receiving confirmation that the 708 Kennedy case has been assigned, the MPD Officer requests that the DCRA 708 Investigator follow up once the case is closed. The DCRA 708 Investigator does not enter the case into the Pilot CRM. The DCRA Investigations Intake Analyst, who is also copied on this email, does not enter the case into the Pilot CRM.

In addition to these specific requests from the MPD Officer, there were multiple intra-agency communications. Ultimately nine DCRA employees were made aware of the request for an inspection/investigation at 708 Kennedy Street and 5410 14th Street between March 22, 2019 and June 3, 2019. Despite the DCRA requirement that all complaints be entered in the Pilot CRM, neither case was ever entered in the Pilot CRM. Failure to use the designated system for tracking customer complaints resulted in multiple opportunities for human error – in each of these opportunities for error in appropriately tasking and following-up on the complaint related to 708 Kennedy, human error prevented interventions.

The Pilot CRM system is pending replacement by a new enterprise CRM system, however, DCRA had communicated the expectation that it be used as the system of record for all incoming customer communications, including investigations. All nine employees failed to use the specified system of record to record customer inquiries or complaints about 708 Kennedy.

The failure of nine individual DCRA employees to enter the request for investigation at 708 Kennedy into the Pilot CRM is the seventh DCRA failure to properly report, respond to, and address the unlicensed rooming house located at 708 Kennedy.

C. Observations

Many factors contributed to the failure of the District Agencies to remedy the concerns identified by the MPD Officer. **In addition to the findings outlined above, A&M observed underlying issues which have contributed to or could contribute to failure to remedy unsafe buildings and unlicensed rentals.** These observations are outlined below across four categories: 1) Communications and Coordination Across Agencies, 2) Systems Maturity and Utilization, 3) DCRA Investigations Management, and 4) Unlicensed Property Oversight.

Communications and Coordination Across Agencies

1. DCRA, FEMS, and MPD lack clear communication channels and processes for reporting, collaborating and following-up on reported code violations

The channels through which information flows between the District Agencies are generally informal. Collaboration between officials across agencies is consistently relationship-based, no clear protocol existed to govern this communication, and centralized systems offered by the OUC were not consistently utilized. Specifically, in communications from the MPD Officer to DCRA and FEMS, the use of informal communications via email to individuals not directly responsible for responding to code violations contributed to several communication failures which factored into DCRA's and FEMS's insufficient response to reports of unsafe conditions at 708 Kennedy. For example:

- Initial communications from the MPD Officer on March 22, 2019 only addressed the findings at 708 Kennedy in the PIR attached to the email. However, the PIR only referenced the 700 Block of Kennedy Street, so the specific address of 708 Kennedy was not mentioned in either the body of the email or the attachment.
- Follow-up email communications from the MPD Officer to DCRA employees did not communicate directly that unsafe conditions required immediate action.
- There is no evidence that the DCRA 708 Investigator communicated with the MPD Officer about the reported violations at 708 Kennedy to either clarify details of the PIR or to provide feedback regarding the findings.
- None of the communications from the MPD Officer to DCRA or FEMS mentioned the bodycam footage that the MPD Officer took of the interior of the property.

Recipients of the email from the MPD Officer were unaware as to why they were included on the March 22, 2019 email. Many DCRA personnel interviewed consistently pointed to a failure of MPD to follow the appropriate channels as a contributing factor to DCRA's failure to recognize and address the severity of conditions at 708 Kennedy. However, MPD had no clear policies on how these issues should be communicated to sister agencies and DCRA was unable to point to any communications, memorandum, or policy which communicated the "appropriate channels" to outside agency partners. DCRA systems and policies in place at the time of the initial reporting and follow-up on 708 Kennedy included no functionality or clear requirement to communicate with complainants to either verify the details of the complaint or inform complainants of status or resolution of their complaints. This lack of "feedback loop" functionality provided insufficient information to key partner agencies and contributed to a lack of accountability regarding the appropriate conduct and finalization of investigations.

2. Lack of responsibility and ownership of building safety issues across multiple agencies

In interactions between DC government agencies related to building safety issues, protocols around task ownership are unclear and not well-understood by agency employees. As a result, inquiries and requests for investigation can go unaddressed, as in the case of 708 Kennedy. The 708 Kennedy response was an example of a complex situation with aspects that could be addressed by either FEMS or DCRA. However, DC code is not written to clearly outline what should happen in cases where jurisdiction over a matter is unclear.

Under 12A DCMR § 115.2 / 115.3 of the Building Code – DCRA is obligated to inspect the premises of any building reported as dangerous. In the case of 708 Kennedy, DCRA failed to verify that the premises had been inspected and the dangerous building remained occupied. FEMS is responsible for the administration of the Fire Protection Code (Under DCMR 12H), except approval, inspection, and testing of new and existing fire protection systems. The violations at 708 Kennedy which were identified in the MPD Officer's PIR included issues in the jurisdiction of both DCRA Investigators and Fire Inspectors. F-108.2 is the only section within the Fire Protection Code specifying coordination of inspections and stipulates that code enforcement officers must seek to minimize the number of visits by code officers:

If more than one code official is required to enforce any provision of the Fire Prevention Code or another code or ordinance, it shall be their collective duty to coordinate their inspections and administrative orders as fully practicable so the owners and occupants of the structure shall not be subjected to visits by numerous Inspectors nor multiple or conflicting orders.

It goes on to stipulate that, "Whenever an Inspector from any agency or department observes an apparent or actual violation of a provision of a law, ordinance or code of the District of Columbia not within the Inspector's authority to enforce, the Inspector shall report the findings to the code official having jurisdiction."¹² DC government has no specific code or authority which provides directions or guidance on expectations for inspection of properties and mitigation of multi-jurisdictional violations, or ownership of responsibility for these issues.

The initial report of the serious code violations at 708 Kennedy sent by the MPD Officer via email to DCRA and FEMS employees included several findings of violations related to the safety of the building, in areas related to both building code and fire code. When the initial complaint from the MPD Officer was sent on March 22, 2019, it was received by both DCRA and FEMS, and recipients at each organization (DCRA

¹² https://os.dc.gov/sites/default/files/dc/sites/os/publication/attachments/OS_DCMR_12H_Fire_Code_Supplement.pdf

Community Outreach Specialist and FEMS Technical Section Lieutenant) forwarded the email on and performed no additional follow-up. In both instances, the initial point of contact in receipt of the complaint assumed no further responsibility after forwarding the email. Neither DCRA nor FEMS took proactive steps to ensure that the complaint was appropriately registered, assigned, or resolved, nor did they receive confirmation of receipt of the forwarded request for investigation. In both examples, an unclear assignment of ownership over incoming complaints let the issue go unremedied. Had it not been for the MPD Officer's persistence, the issue would have never been reviewed any further by either FEMS or DCRA.

Systems Maturity and Utilization

3. DCRA's Pilot CRM and Investigations Module are inconsistently used, and lack functionality to enhance accountability

Over the last year, DCRA has been developing a set of tools to support its staff, including the Investigations team, in the execution of their responsibilities. These tools include a pilot CRM system through which all customer complaints are intended to be logged, routed, and tracked to completion and a module within the QuickBase system for investigators, the Investigations Module, which records the status of each case and serves as the system of record for cases like 708 Kennedy. DCRA has invested significantly in developing the Pilot CRM which is currently in place as a central source of communication for incoming customer interaction requiring follow-up. Treating the current system as a pilot program, soon to be replaced by a more robust system, DCRA has secured a vendor to build an Enterprise CRM which will have significant functionality beyond the pilot version currently utilized. This Enterprise System, when fully implemented, is intended to seamlessly integrate with the Investigations Module to convert leads into cases with minimum manual effort.

DCRA management has indicated that the Pilot CRM system was rolled out in early 2019, and shared documentation demonstrating DCRA-wide implementation in February 2019. This pilot system was implemented prior to the initial 708 Complaint; however, interviews with staff reflect their understanding that the Pilot CRM system was not fully-implemented at this time and was not used to track the case. With no central reporting system, reporting and assignments associated with 708 Kennedy were routed informally, via email, with no official log of the complaint or subsequent actions, and no process in place to require follow-up with the original complainant. This lack of systematized tracking contributed to DCRA's failure to act on the report of 708 Kennedy for over a month until the MPD Officer reached out to follow-up on the initial complaint. If not for the MPD Officer's continued outreach, the 708 Kennedy complaint would not have been reviewed or acted upon.

Despite the case assignment on May 21, 2019, the complaint was not entered into the Investigations module of QuickBase until June 12, 2019. DCRA's system for tracking the progress of investigations was

not kept up-to-date with the most recent activities, but rather, a copy of this log exported to the DCRA Investigation Program Officer's desktop known as the "Regulatory Investigation Database" was used to maintain status until the system was updated. Throughout the process of responding to the 708 Complaint, DCRA staff continually used informal methods outside the system of record to track the progress of investigations activities. Not only does this mean that at no time during the investigation could leaders within DCRA directly access the current status of the case, but it also means that important points of documentation such as the dates of visits and communications were not included in the systems of record for communications (Pilot CRM) or investigations (Investigations Module).

DCRA staff indicated that though only a few individuals were authorized to close cases, the Investigations Module does not have user roles configured to reflect these permissions. In its current configuration, the QuickBase system allows any user with access to the Investigations Module to update case status to any status, including "suspended" or "closed." This lack of user controls over systems weakens DCRA's ability to oversee investigations and appropriately control case status.

In addition to the limitations associated with the use of the Pilot CRM and Investigations Module, DCRA's practices in use of common workplace tools like email are not best aligned to supporting responsiveness and accountability. At the time of the initial 708 Complaint, DCRA relied on personal inboxes for communications which could be better served by a shared in-box with "around the clock" monitoring responsibilities. Designating a shared method of contact for inter-agency and external referrals can increase visibility and accountability.

4. FEMS use of the Zoll system does not support transparency and accountability for the handling of complaints

Like DCRA, the Fire Inspection Service of FEMS receives many incoming calls and emails which require coordination between multiple personnel and leaders, and which often reflect urgent and potentially life-threatening conditions in buildings across the District. To track these reported violations, FEMS uses its Zoll inspection tracking system. However, interviews with FEMS employees reveal that the inspections are only updated in the system by the FEMS inspectors after they have visited the property. Once a complaint is received by a FEMS employee, it is typically forwarded to the Administrative Officer in charge of Fire inspector assignments, who then assigns cases to FEMS inspectors. However, current procedures require no record of the assignment until after an inspector has visited the property. FEMS leadership communicated a clear expectation throughout the organization that complaints related to building safety need to be evaluated, in-person within 24 hours of receipt, but without clear and centralized documentation of intake, there is no way to verify that this metric is being met. In the case of 708 Kennedy, upon initial receipt of the complaint on March 22, 2019, two FEMS recipients forwarded the email without the attachment to the FEMS Inspections Lieutenant. Given that 708 Kennedy was only referenced in the attachment, the FEMS Inspection Lieutenant did not have necessary information to be aware of or to

assign an inspector to visit that property. Prior to the fire, FEMS only logged complaints once a FEMS inspector visited the site related to the complaint. An immediate decision not to follow-up on a complaint resulted in no record of the complaint being recorded and led to no further action being taken on the complaint. This lack of a formal system for handling incoming complaints and documenting decisions not to pursue complaints reduced the accountability of staff and limited visibility into the history of complaints and their handling. Without a process to track all complaints received, and the action in response to those complaints, FEMS Fire Inspection Service leaders had limited visibility or oversight into decision-making of individual complaint recipients. Note: Effective August 23, 2019, FEMS' implemented GO 502 (Complaint Procedures), establishing level of review and approval required for complaints and referrals, documentation required, follow-up protocol with appropriate agency, and emergency procedures.

5. Systems access is limited within and across District Agencies

During A&M's interviews at DCRA, employees maintained a strong awareness of the narrow scope of control ascribed to their role within DCRA and the organization's role in the code enforcement process. Particularly, DCRA investigators communicated that they were explicitly prohibited from attempting to inspect or investigate issues related to Housing Code, which would need to be addressed by DCRA inspectors. DCRA roles are compartmentalized between groups, so not all investigators have knowledge of Housing Code requirements or the systems used to track and assess adherence to these requirements.

Although specialization in these roles can support the development of expertise in a domain of knowledge, the division between roles at DCRA has contributed to a lack of communication, ownership over responding to and referring complaints, and resource sharing between inspectors and investigators. The systems of record for inspections (ACCELA) and investigations (Investigations Module) both could serve as resources to all inspectors and investigators at DCRA, however, inspectors have no access to investigative systems and not all investigators, as a matter of procedure, access DCRA inspections records.

In the case of 708 Kennedy, the DCRA 708 Investigation performed an investigation at 708 Kennedy without first accessing and reviewing the long history of property complaints against the property. Additionally, despite a wealth of data in ACCELA which could be useful to public safety officers, neither FEMS nor MPD has access to the system.

External to DCRA no formal cross-training on issues of zoning and building code exists for the staff of other agencies who regularly access the District's residences and businesses. As a result, many MPD and FEMS first responders are not empowered to assist DCRA. In the case of 708 Kennedy, the MPD Officer who identified and reported the code violations had been enrolled in a discontinued 2003 cross-enforcement training program that trained the officer to identify and report code violations. This training is not common among MPD and FEMS first responders in the District.

Additionally, several DCRA staff and leaders suggested that the lack of adherence by internal staff and external agency partners (MPD Officer) to the DCRA Duty Officer SOP contributed to DCRA's lack of appropriate response to complaints and inquiries. However, on review of communications documentation, DCRA leaders were unable to identify widespread distribution or communication of these procedures or related expectations.

6. Audit log unavailable for DCRA complaint and investigations tracking applications

A&M reviewed records of complaints, inspections, and investigations throughout DCRA's systems. Using ACCELA, A&M was able to clearly understand the permitting and inspection history for the property at 708 Kennedy and view a detailed list of activities and status changes as recorded in the system dating back over 25 years. This detailed log, which included timestamps and user identification for each entry and status change was easily accessed and shared by DCRA staff in response to A&M's initial data request. The level of detail of these records, and ease of access reflects a mature IT system which supports accountability and auditability and allows DCRA employees to readily access relevant information in line with best practices for IT systems. The A&M team requested similar logs for all events and activities in the QuickBase system, which includes both the Customer Relationship Management and Investigations Modules. Despite several requests over the course of our investigation, DCRA was unable to produce any activity log or other serviceable record of either Pilot CRM or investigations activity in QuickBase. The absence of detailed, auditable logs of activity can hinder the ability of an organization like DCRA to manage employee workloads and impedes the ability of internal or external auditors to evaluate organizational effectiveness. Without this timestamped log, A&M had to rely upon unofficial offline versions of the logs which were exported and emailed between DCRA staff as a record of status changes. Not only does this lack of auditable log limit backward-looking transparency, but it makes it impossible to verify that employees are only taking actions that they are appropriately authorized to make.

In interviews, the A&M team learned that not only does the Investigations Module lack an accessible audit log, but it includes no user-role based controls, which are used in IT systems to permit only appropriately authorized individuals to take certain actions.

DCRA Investigations Management

7. Lack of continuity of DCRA Investigations management personnel allowed the 708 Kennedy case to remain unresolved

DCRA's Investigations unit's management team was in transition during the events leading up to the 708 Kennedy Fire. When the DCRA Investigations Program Manager was removed from the role in June 2019, the DCRA Investigations Program Officer was promoted to act as the program manager. The DCRA

Investigations Program Officer made a concerted effort to improve systems and processes, but the workload assumed by DCRA Investigations Program Officer responsibilities was overwhelming, so much so that the DCRA Investigations Program Officer asked the DCRA 708 Investigator to step into a new role supporting him as Lead Investigator. Through this interim assignment of assisting the DCRA Investigations Program Officer with the administration of investigations, the DCRA 708 Investigator was pulled off field work and the DCRA 708 Investigator's open investigations were put in a "suspended" status, meaning they were not being actively worked by an investigator.

During this transition, both the DCRA Investigations Program Officer and DCRA 708 Investigator acknowledged being too busy with administrative duties to invest any additional time in the 708 Kennedy Investigation. Further, no specific leadership training or support was offered to either employee as they took on additional responsibilities without transitioning out of old responsibilities. DCRA did not proactively plan to ensure continuity through leadership changes and did not provide the additional resources or oversight necessary to aid the transition of the leadership of the Investigations Division or ensure that the workload of the new group leaders was sufficiently addressed before pulling them away from the line. Additionally, this difficult transition was exacerbated by the absence of the DCRA Investigations Program Officer due to pre-planned vacation shortly after assuming the new role. A lack of continuity in the leadership of the Investigations Division contributed to several shortfalls in accountability, oversight, and follow-up on the 708 Kennedy case in the months leading up to the fire.

8. Limited formal training or job requirements for investigators

The position of investigator within DCRA is critical to verifying that District businesses are operating within the specifications of their permits. A small team of 12 investigators is tasked with monitoring compliance for the entire District. However, during interviews and document review, A&M learned that, at the time of the 708 Kennedy Fire, no formal training specific to the requirements of the District or inspections background was required for investigators. New hires take an external training course through a third-party provider and learn through "shadowing" and on-the-job training during as little as one investigation.

Not only does this this lack of formal, DC-specific training significantly increase the risk for error in day-to-day work, it leaves investigators with varying expectations on the extent of their responsibility and authority. This limited training period does not empower investigators to support other DCRA missions, such as verifying code compliance or identifying illegal construction. In addition to a lack of formal training, DCRA Investigations had no formal SOP stating specific requirements for what steps are required for an investigator to appropriately follow-up on a complaint, or even mark as case as closed. This process relies on the experience of the investigator and the trust and oversight of one program manager. Without formal expectations, investigators may err on the side of leniency in areas where they are unclear on legal requirements, they may fail to perform activities consistently due to the lack of clear requirements, and

they may not perform and document all investigations to the level of service required to fulfill the agency's mandate.

9. No process for prioritizing properties for investigation

At the time that DCRA received the 708 Complaint from the MPD Officer, DCRA had no clear process or approach for prioritizing properties for investigation or inspection. The 708 Complaint filed by the MPD Officer reflected that the building was being used outside of its authorized use, serving as a rooming house rather than a pharmacy, and noted violations of both DC Housing and Fire Codes. The details of this initial report were severe enough to necessitate inspection for both housing and fire code violations and investigation of building use. Additionally, a review of the history of issues at 708 Kennedy identified that the building had several past issues and reports, including:

- Several cases of unsafe conditions at the rear of the building related to:
 - Unsafe shed structure
 - Trash and debris
- Complaints that the building was being used as an unlicensed rooming house in 2003 and 2004, both of which were followed up with attempted enforcement action in 2008.

For additional information on the history of issues at 708 Kennedy, refer to *Appendix A*.

By the time that DCRA registered the most recent complaints from MPD (April 2019) the property had been the subject of several violations and infractions and had generated enough concern that an MPD Officer reached out several times on the property. Despite a history of problematic reports, and a police report and subsequent follow-up which communicated risks, this property was not prioritized by investigators. In interviews with DCRA employees, A&M confirmed that prior to the 708 Kennedy Fire DCRA had no formal standards for escalating property investigations as urgent unless they have a clear reason to believe that the structure poses an immediate threat of collapse.

10. Oversight and accountability over investigations is limited

The missteps outlined in the *Findings* section above arose not only from individual failures, but from an overall lack of personal and organizational accountability within DCRA's Investigations Division. The work of investigators throughout the timeline of events leading up to the 708 Kennedy Fire was not consistently overseen by Program Managers, and in the course of managerial transitions, several opportunities to intervene in the case were missed. DCRA's Investigations Division required no standardized mandatory reporting of activities during investigations, and DCRA leadership had established no process for auditing, or even verifying completion of work associated with cases which have been marked as suspended or closed. The DCRA Investigations Program Officer (who had been in-position for less than six months when the 708 Kennedy Complaint was received) relied on personal trust of investigators to perform appropriate follow-up, rather than any enforcement of standards, review of work product, or auditing of work

performed. In the case of 708 Kennedy, the DCRA Investigations Program Officer trusted that the DCRA 708 Investigator had appropriately attempted to contact the property owner, documented the investigation, and closed the case due to an inability to verify the complaint after taking reasonable steps to investigate. Upon later review, the DCRA 708 Investigator could provide only photos of the front of the building from one visit and had no record of visiting the property multiple times or checking at other points of entry. The DCRA 708 Investigator never visited the back side of the property and was unable to provide any record of the subsequent visits or attempts at communication. Not only had the DCRA Investigations Program Officer not verified completion of this investigation, but no program of sampling or review had been established at the time of the fire. Additionally, DCRA had no internal audit function as an organization. Without holding investigators to standards for due diligence and documentation, DCRA had no way of knowing whether properties like 708 Kennedy or other similar properties across the District had been appropriately investigated. The absence of an internal audit function within DCRA elevates the risk that process failures could go unchecked within the Investigations Division or elsewhere.

Unlicensed Property Oversight

11. District Agencies have limited resources and authority related to unlicensed rental properties

DCRA has very limited ability to investigate or inspect commercial or residential properties which are suspected to be used outside of their licensure. No Certificate of Occupancy or housing inspection is required for single family rental units. Under DCRA's current processes for receiving a BBL application, a landlord can receive a BBL by self-certifying compliance using the One Family Dwelling Basic Business License Self Certification Form. The responsibility to ensure the safety of the property rests entirely on the owner. In instances where an owner is operating a rental unit which is not in compliance with DC Housing Code, owners may opt not to request an inspection. DCRA's process for inspecting or investigating properties for use outside of their CoFO's stated use is wholly reliant on self-reporting by landlords, or complaints by tenants and members of the community. DCRA does not take active preventive measures to identify unlicensed rental units offered for lease are compliant with building code or other consumer protections.

Like the CoFO process for rental units, which relies on owners of single-family rental units to ensure the safety of their property, the business license process for commercial properties places the onus on business owners to request an inspection when the use of their business changes. A business owner operating one business (for example, a pharmacy) can maintain a CoFO for that business indefinitely with no recurring inspections. In the case of 708 Kennedy Street, the CoFO for a Pharmacy, and later for Cigarette sales stood for over 25 years while the business was converted to serve as a seamstress shop and unlicensed rooming house. This system of self-reporting for businesses puts DC residents and customers at risk of unsafe properties and leaves a significant accountability gap for DC property owners

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who seek to change their business offering and/or building configuration. DCRA relies on complaints from neighbors, tenants, and members of the public as the primary check on the safety of small business establishments. Deterrents to the inappropriate use of buildings are clearly limited in their effectiveness, as the “Walker Pharmacy” at 708 Kennedy was twice identified as an unlicensed rooming house prior to the 2019 sequence of events, and DCRA never shut down the business.

V. RECOMMENDATIONS

A. Introduction

In accordance with the SOW, A&M has developed recommendations to address the underlying issues identified in Section IV (Findings and Observations) of this report. These recommendations have been informed by best practices utilized by corresponding agencies in other metropolitan cities.

A&M has also noted that the District Agencies have made a number of changes that should address, in part, many of A&M's recommendations provided below. A&M has not reviewed the effectiveness of these changes but describes them in further detail in the following paragraphs.

B. Relevant Improvements Made by District Agencies To-Date

Through changes to policies and procedures, training, and systems, the District Agencies have taken a number of steps which address, in part, many of the underlying issues noted in A&M's Observations.

The District Agencies will need to continuously assess the extent to which the steps taken to-date will address the accountability gaps.

1. MPD

Subsequent to the Kennedy Fire, on September 3, 2019, the MPD issued the EO 19-005 to immediately standardize the MPD's process for communicating reports of code violations to FEMS and DCRA. The Executive Order requires MPD Officers to immediately notify a supervisor who is then required to respond to the scene. The on-scene supervisor will notify the FEMS Fire Liaison Officer via OUC of the location and threat. The MPD Officer is also required to send an email to dcra@dc.gov, copying mpdcic@dc.gov, prior to end of shift and to complete the appropriate field report.

2. FEMS

FEMS has updated its General Orders and, shortly after the Kennedy Fire, on August 23, 2019, FEMS issued a GO 502 (Complaint Procedures) which lays out a formal process for handling reported complaints, noting that that complaints will be forwarded to Administrative Assistant for logging/assignment and copied to Fire Marshal and Assistant Fire Marshal. The Administrative Assistant will log the complaint, assign a tracking number, and forward to Division Inspections Supervisor for inspector assignment. Inspector must speak with complainant or inspect location within 24 hours or the next business day. Administrative assistant shall log completed report and forward copy to Fire Marshal/Assistant Fire Marshal.

3. DCRA

A&M noted that, prior to the Kennedy Fire, DCRA had already taken steps to change its culture, including the way in which the agency communicates internally and with its customers. Such changes include the following:

- Implementation of an eLearning system, launched in March 2019, to facilitate staff training and the socialization of SOPs
- Migration of the offline version of the Regulatory Investigation database into the Investigations Module. This database provides reports on aging cases and a more centralized process for tracking investigations.
- Issuance of an RFP in July 2019 for the Enterprise CRM making it easier to find information across the agency. The Enterprise CRM contract has been awarded to a vendor and systems development has begun.
- Issuance of an RFP in February 2018 aimed at changing the culture at DCRA (“Culture Change RFP”). The RFP was recently awarded to a vendor with a contract start date of September 12, 2019.
- Establishment of an internal audit function. A contractor was hired in summer 2019 to set up an internal audit function for DCRA. In December 2018 and October 2019, DCRA approved job descriptions for a Compliance Specialist and Program Manager, respectively, to support the Internal Audit function.

Though no Investigation SOPs were issued prior to the 708 Kennedy Fire, the RIS team created guidance in December 2018 regarding the investigative report submission and approval. This information was disseminated to investigators in January 2019. Prior to the 708 Kennedy Fire, DCRA was also in the process of creating SOPs for various roles within the organization and has subsequently issued a number of them including the CPU SOP issued on September 13, 2019.

C. Recommendations to Address Key Findings

The following table lists A&M’s recommendations to address the Key Findings identified. This section, combined with the District Agency Recommendations to Address Observations below, should be used as a foundation to create an action plan for the District Agencies. Please note, the findings above are organized by the agency in which critical missteps occurs, however the recommendations below are directed towards the all of the District Agencies which could benefit from implementation of the recommendation.

Table 10 - Recommendations to Address Key Findings

#	Applicable Agency	Category	Description	Recommendation
F.1	District Agencies	Systems	Improper Communication Channel Used to Contact Duty Officer	a) Systemize circulation of SOPs and require signatures acknowledging receipt and understanding. b) Create single point of intake for customer inquiries for each agency
F.2	District Agencies	Systems	DCRA Duty Officer does not respond to request for investigation	a) System must support CRM case generation from email b) Update SOPs to provide guidance on expectations around receipt of emails c) Single inbox per agency
F.3	District Agencies	Training	FEMS does not include PIR in forwarded email	a) Train employees to be more diligent in the forwarding of complaints to ensure that key information is not lost b) Require that relevant employees attempt to follow up with complainants to ensure that they have obtained a full understanding of the issue reported prior to acting
F.4	FEMS	Systems	FEMS does not act or follow up on complaint	a) Configure FEMS tracking system to start tracking at complaint intake to increase accountability b) Refine SOP to clarify that follow up with complainant is required c) Systemize circulation of SOPs and require signatures acknowledging receipt and understanding.
F.5	DCRA	Systems	DCRA fails to assign case to DCRA investigator or log case into QuickBase	a) System must support CRM case generation from email (note: repeated from F.2a above) b) Case Assignment should occur via the Pilot CRM, not via email
F.6	DCRA	Systems	DCRA 708 Investigator performs limited investigation	a) Create required field in Investigations Module in QuickBase

#	Applicable Agency	Category	Description	Recommendation
				b) Update DCRA Investigator SOP to establish higher standards of minimum required evidence/work per case c) Require investigator, manager, and program analyst e-signature prior to suspension or closure of case
F.7	DCRA	Systems	DCRA suspends case without documentation or approval	a) Require investigator, manager, and program analyst e-signature prior to suspension or closure of case b) Institute user-role based permissions which allow only the appropriate supervisors to close cases
F.8	DCRA	Systems	DCRA closes case without case file or signature of approval	a) Require investigator, manager, and program analyst e-signature prior to suspension or closure of case b) Institute user-role based permissions which allow only the appropriate supervisors to close cases
F.9	DCRA	Systems	DCRA Employees fail to enter case into Pilot CRM despite multiple outreach attempts from MPD Officer	a) Configure CRM system to support automated generation of CRM inquiries via email (note: repeated from F.2a and F.5a above) b) Evaluate Training provided to DCRA employees around expectations of use of CRM

F.1 District Agencies should establish a process to share and train staff on policies and procedures to ensure agency-wide adherence to policies.

During the 708 Kennedy response, DCRA lacked the formal channels necessary to ensure understanding of essential policies and procedures by all agency staff. The lack of internal controls regarding the dissemination of the Duty Officer SOP prevented DCRA staff from utilizing the requisite reporting channels in the case of 708 Kennedy. A&M recommends:

- a. DCRA should implement a clear process for drafting, reviewing, and publishing SOPs, and training staff on those SOPs. DCRA should also require that staff receive training on long-standing SOPs that do not require updates. In addition to receiving training on current and new SOPs, DCRA

should require signatures from staff acknowledging receipt and understanding of new policies and procedures. In addition to the SOPs that DCRA is currently revising or creating, the agency should ensure that all current SOPs dealing with emergency situations are shared within the agency. Where appropriate, as in the case of the Duty Officer SOP, DCRA should consider sharing the SOP with partner organizations such as MPD and FEMS.

Note: DCRA has updated its SOP template and formalized the SOP approval process in January 2019, prior to the fire. All SOPs are currently available to staff members on DCRA's intranet site. DCRA has also indicated that staff members are trained on SOPs via the third-party eLearning platform.

- b. District Agencies should develop a single point of intake for customer inquiries to prevent emergency requests going unaddressed. In addition to creating this system, agencies should collaborate to ensure that the single points of intake are clear across organizations to allow for referrals, requests for support, and support coordination efforts. To support this system, District Agencies should discourage employees from relying upon informal relationships to make requests to ensure that information is funneled through a single source.

Note: DCRA has established a customer referral phone line and online on-demand customer relationship management form (via the Pilot CRM System) which the public can use to directly submit complaints. However, A&M discovered in interviews that many DCRA employees receive a high volume of informal and formal requests via email. Prior to October 2019, DCRA's current Pilot CRM system did not support the automated creation of CRM records from an email. DCRA has improved the Pilot CRM system to address this system and indicated that the new Enterprise CRM system is in development and will eventually be able to automatically convert an email to a CRM record without human intervention.

F.2 District Agencies should automate the creation of customer inquiry/complaint intake through designated shared resources to reduce the potential for human error.

DCRA does not have sufficient internal controls to ensure that every request made via email to DCRA employees is seen, triaged, replied to, and acted upon. This lack of controls creates possible scenarios where emergency requests sent via email could go unaddressed. A&M recommends:

- a. DCRA should adopt a system that can automatically generate CRM records from email records. Currently, DCRA employees read emails and then manually enter case information into the Pilot CRM. A&M learned from various administrators in interviews that between high workloads and high volume of communications, that it is possible to overlook urgent requests. DCRA has recently awarded a contract for the implementation of a new Enterprise CRM. A&M recommends that the new enterprise system has the capability to automatically generate CRM records from emails.

- b. DCRA should update SOPs for all its employees to provide guidance on the minimum level of service expectation regarding all forms of communication (i.e., expectations regarding responding to phone calls, referring information to internal and external parties, receiving case information, and email communication).

Note: In September 2019, DCRA published a new CPU SOP that provides in-depth expectations and timelines for DCRA employees around case intake, communication with the complainant, receiving and sending referrals to other agencies, and general processes for case investigations.

- c. District Agencies and other DC Government Agencies should adopt a single intake inbox to ensure that all received requests are appropriately responded to, triaged, and acted upon in a timely manner. In addition, District Agencies should inform the general public and other DC Government Agencies on the most efficient way to route complaints – through a central email or direct entry into an online tracking system – in order to reduce the reliance upon informal communication (email) within DCRA.

Note: Currently, all District Agencies have single intake inboxes established. However, A&M found during its email review and interview process that employees were not aware of that a single inbox for each agency existed. There was also no evidence that employees were referring requests through the single inbox for each Agency to control the flow of information and request.

F.3 District Agencies should train employees on best practices regarding information sharing and complainant follow up to ensure that all case information is made available.

Prior to the 708 Kennedy Fire, DCRA and FEMS did not require that employees responsible for intake, triage, assignment, investigation, or inspection of cases to follow up with the complainant. In the case of 708 Kennedy, the lack of follow up with the complainant delayed the investigation of the case. In addition, this issue created an information gap where the DCRA 708 Investigator performed an investigation without all available information. A&M recommends:

- a. District Agencies and other DC Government Agencies should implement training for all employees to ensure that key information is not lost in the intake, referral, or case assignment process.
- b. District Agencies should edit SOPs to require that employees follow up with complainants in every case within specific time requirements to ensure that all information is available during the follow up District Agency action and to create accountability to the customer.

Note: DCRA published a new CPU SOP in September 2019 that provides in-depth expectations and timelines for DCRA employees around case intake and communication, follow-up, and close out processes with the complainant.

F.4 FEMS should implement a new CRM system that begins tracking a new case as soon as a complaint is received.

Prior to the 708 Kennedy Fire, FEMS did not start tracking cases at the time a complaint was received. Instead, FEMS employees were instructed to start tracking cases once inspectors conducted an action at a property site. This system creates risk due to a lack of case oversight between the time a complaint is received and the first time an action is taken by an FEMS employee to address that complaint. A&M recommends:

- a. FEMS should configure its internal systems to begin tracking complaints when they are reported. In addition, the complaint intake system should integrate fully with the FEMS scheduling and case tracking systems.

Note: Effective August 23, 2019, FEMS' implemented GO 502 (Complaint Procedures), establishing level of review and approval required for complaints and referrals, documentation required, follow-up protocol with appropriate agency, and emergency procedures. GO 502 lays out a formal process for handling complaints which includes recording the complaint prior to assignment to an inspector.

- b. FEMS should write and incorporate SOPs to require that FEMS employees follow up with complainants in every case within specific time requirements.
- c. FEMS should implement a clear process for drafting, reviewing, and publishing SOPs, and training staff on those SOPs. In addition to receiving training on new SOPs, FEMS should require signatures from staff acknowledging receipt and understanding of new policies and procedures. Where appropriate, FEMS should consider sharing the SOP with partner organizations such as MPD and DCRA.

F.5 DCRA systems should automate the creation of CRM records to reduce the potential for human error.

Between March and August 2019, DCRA employees failed to either log the 708 Kennedy case in the Pilot CRM or into the Investigations Module despite multiple communications with the MPD Officer. The failure to input the case into the systems prevented DCRA managers from tracking the formal progress of 708 Kennedy. In addition, the DCRA 708 Investigator never received a systems-based notification stating that a case had been assigned. Without systems guiding case workflow, further room for human error is created. A&M recommends:

- a. DCRA should adopt a system that can automatically generate CRM records from email records. Currently, DCRA employees who receive written requests are required to manually enter cases into the CRM. Due to the volume of email traffic received by DCRA employees, this additional step

creates room for human error. DCRA has indicated that, in October 2019, the Pilot CRM was configured to generate a CRM record with the touch of a button. DCRA has recently awarded a contract for the implementation of a new Enterprise CRM. A&M recommends that Enterprise CRM system have the capability to automatically generate CRM records from emails. (**note:** this recommendation is repeated from F.2a)

- b. DCRA Case Assignments should occur via CRM notifications that are prompted after a case has been created in CRM. DCRA Case Assignments should not be communicated via email.

F.6 DCRA systems should be updated to provide additional levels of accountability over and visibility into case management.

DCRA systems lack oversight capabilities over the case investigation process. This lack of oversight can lead to improper or incomplete investigations being conducted, such as the case at 708 Kennedy. A&M recommends:

- a. DCRA should create required fields in the Consumer Complaints module in QuickBase to ensure that a minimum level of documentation, notes, and other evidence (photos, research, etc.) are provided for each case.
- b. DCRA should update the DCRA Investigator SOP to define the baseline requirements of a DCRA investigator for every case that she/he is assigned. These baseline requirements should inform the established required fields in QuickBase.
- c. DCRA should configure its systems to require e-signatures from the investigator, program manager or officer, and program analyst in the case file prior to the suspension or closure of an investigation.

F.7 DCRA should require appropriate signatures and proper documentation prior to the suspension of an investigation.

DCRA lacks formal policies and procedures to govern the process by which an investigation can be suspended. For example, there are not clear criteria to define the situation in which a case suspension should be permitted or what type of evidence is necessary to finalize a suspension. A&M recommends:

- a. DCRA should configure its systems to require e-signatures from the investigator, program manager or officer, and program analyst in the case file prior to the suspension or closure of an investigation.
- b. DCRA should implement user-based permissions in the Investigations Module of QuickBase to ensure that cases are being closed appropriately in accordance with the designed workflow (i.e., Program Analyst closes all cases after receiving signature from Program Manager and

investigator.) The user-based permissions should limit the type of role that can close a case (i.e., DCRA investigators should be not permitted to close their own case in the Investigations Module).

F.8 DCRA should require various signatures and proper documentation prior to the closure of an investigation.

DCRA lacks formal policies and procedures to govern the process by which an investigation can be closed. For example, there are not clear criteria to define the situation in which a case closure should be permitted or what type of evidence is necessary to finalize a closure. A&M recommends:

- a. DCRA should configure its systems to require e-signatures from the investigator, program manager or officer, and program analyst in the case file prior to the suspension or closure of an investigation.
- b. DCRA should implement user-based permissions in the Investigations Module to ensure that cases are being closed appropriately in accordance with the designed workflow (i.e., program analyst closes all cases after receiving signature from program manager and investigator.) The user-based permissions should limit the type of role that can close a case (i.e., DCRA investigators should be not permitted to close their own case in QuickBase).

F.9 DCRA systems should automate the creation of CRM records to reduce the potential for human error.

Despite various announcements, memos, and in-person trainings, the Pilot CRM was not properly used by multiple DCRA employees after various communications with the MPD Officer. To eliminate the potential for human error, DCRA should implement a system that maximizes the automation of CRM cases from written complaints while also evaluating the training provided to DCRA employees around expectations of the use of the CRM. A&M recommends:

- a. DCRA should adopt a system that can automatically generate CRM records from email records. Currently, DCRA employees who receive written requests are required to manually enter cases into the CRM. Due to the volume of email traffic received by DCRA employees, this additional step creates room for human error. DCRA has recently awarded a contract for the implementation of a new Enterprise CRM. A&M recommends that the new enterprise system have the capability to automatically generate CRM records from emails. (**note:** this recommendation is repeated from F.2a and F.5a)

Note: Based on discussions with the DCRA Director, it is evident that this is a long-term goal of the Enterprise CRM being implemented but that, in the short-term, the Pilot CRM will not have this capability.

- b. DCRA should review and evaluate the training and messaging provided to DCRA employees around the expectations of using the CRM. If DCRA determines that there are gaps in the training provided, DCRA should develop an action plan to ensure that all DCRA employees are familiar with and comfortable executing the necessary steps to maintain an agency-wide CRM.

D. Recommendations to Address Observations

The following table lists A&M's recommendations to address the Observations identified in Section IV.C of this report. This section combined with the Agency Recommendations to Address Key Findings above can be used as a foundation to create an action plan for District Agencies (DCRA, FEMS, MPD). Additionally, broader reforms which may require District-wide collaboration, or legislative reform have been identified as recommendations to "DC Government".

Table 11 - Recommendations to Address Observations

#	Applicable Agency	Category	Description	Recommendation
O.1	District Agencies	Communications and Coordination	DCRA, FEMS and MPD lack clear communication channels and processes for reporting, collaborating and following-up on reported code violation	a) Establish policies which require consistent communications b) Implement basic housing and fire code training at FEMS and DCRA c) Implement basic code training at MPD d) Establish a complainant feedback loop at DCRA and FEMS
O.2	District Agencies	Communications and Coordination	Lack of responsibility and ownership of building safety issues across multiple agencies	a) Provide MPD and FEMS access to the central online database b) Generate a cross-agency reference guide of common violations in the District c) Consider implementing a policy requiring the initial complaint recipient immediately register the complaint.
O.3	DCRA	Systems Maturity and Utilization	DCRA's Pilot CRM and Investigations Module are inconsistently used and lack	a) Establish reporting protocol within DCRA related to receipt of complaints b) Inform the public and other agencies regarding most

BETWEEN DCRA, FEMS, AND MPD

#	Applicable Agency	Category	Description	Recommendation
			functionality to enhance accountability	efficient communication methods for complaints
O.4	FEMS	Systems Maturity and Utilization	FEMS use of the Zoll system does not support transparency and accountability for the handling of complaints	a) Establish reporting protocol within FEMS related to receipt of complaints b) Inform the public and other agencies regarding most efficient communication methods
O.5	District Agencies	Systems Maturity and Utilization	Systems access is limited within and across agencies	a) Develop a central online database accessible by DCRA investigators and inspectors b) Provide MPD and FEMS access to DCRA's central online database c) Explore the use of combination inspectors/investigators within DCRA d) Implement basic code training and establish reporting protocol for MPD and FEMS employees
O.6	DCRA	Systems Maturity and Utilization	Audit log unavailable for DCRA complaint and investigations tracking applications	a) Ensure that an audit log capability is available and easily-accessible for all systems used b) Implement user-based controls for all systems used
O.7	DCRA	DCRA Investigations Management	Poor continuity of DCRA Investigations management personnel allowed the 708 Kennedy case to remain unresolved	a) Consider performing a benchmark analysis against other metropolitan governments b) Mandate that all employees use the intended IT systems
O.8	DCRA	DCRA Investigations Management	Limited formal training or job requirements for investigators	a) Develop and distribute SOP for investigators b) Implement a robust onboarding training and compliance program for investigators

BETWEEN DCRA, FEMS, AND MPD

#	Applicable Agency	Category	Description	Recommendation
				c) Require above-the-minimum continuing education for all DCRA investigators
O.9	DCRA	DCRA Investigations Management	No process for prioritizing properties for investigation	a) Establish policies and procedures for addressing high-priority issues in short time periods. b) Require mandatory fields in CRM and QuickBase systems c) Require inspectors and investigators to evaluate property history in case report d) Develop the CRM/QuickBase systems to assign ownership of cases to multiple parties
O.10	DCRA	DCRA Investigations Management	Oversight and accountability over investigations is limited	a) Create mandatory progress report updates in QuickBase modules b) Require mandatory fields in investigation and inspection reports c) Establish an internal audit function
O.11	DC Government	Unlicensed Property Oversight	District agencies have limited resources related to unlicensed rental properties	a) Explore opportunities to improve building safety and use standards as a requirement to receive and maintain a BBL and/or CofO. b) Consider pursuing legislative and administrative reforms to empower the District to require recurring inspections on all rental properties and licensed businesses to confirm compliance with building, zoning, and fire code

#	Applicable Agency	Category	Description	Recommendation
				c) Consider improving proactive efforts to identify unlicensed rentals

Communications and Coordination

0.1. District Agencies should collaborate to create formal, consistent, and effective communications.

DCRA, FEMS, and MPD lack formal policies and procedures to govern communications across agencies, leading to a lack of clear coordination channels among the District Agencies. A&M recommends:

- a. District Agencies should collaborate to develop consistent policies and procedures regarding how District Agencies should communicate and follow-up on reported code violations. Specifically, the agencies should establish clear lines of communication based on the urgency and nature of the communication.

Note: Related to the planning and coordination of emergency response efforts, the District does use OUC and HSEMA. Additionally, DCRA has created, but not yet distributed, an SOP for Duty Officers, establishing that DCRA employees contact the DCRA Duty Officer through HSEMA's 24-hour operations center. A&M recommends DCRA distribute the SOP to all DCRA employees.

- b. FEMS and DCRA should implement basic housing and fire code training for all field employees to ensure investigators and inspectors are knowledgeable regarding common code violations.
- c. Basic code training should be extended to other agencies, including MPD, that routinely access properties and can encounter, identify, and report obvious code violations to the appropriate District Agency.
- d. FEMS and DCRA should develop/utilize a system that automatically provides feedback to complainants. At the time of the fire, FEMS did not have systems in place to update the complainants on the status of cases.

Note: Effective August 23, 2019, FEMS implemented GO 502 (Complaint Procedures), establishing level of review and approval required for complaints and referrals, documentation required, follow-up protocol with appropriate agency, and emergency procedures. While DCRA has the Pilot CRM system which has this functionality, the Pilot CRM system is not consistently utilized. This feedback loop for complaints will allow for an additional level of oversight.

O.2. DCRA and FEMS should Establish cross-agency code enforcement policies and procedures to ensure coordinated response efforts and accountability across District Agencies.

Protocols and task ownership among District Agencies regarding response to code violations are unclear and not well understood by agency employees, resulting in inefficient processes and unaddressed complaints. The only document providing guidance on distribution of responsibilities between DCRA and FEMS is the MOA signed September 15, 2000. The primary concern of MOA “is to ensure that the necessary fire protection and inspection services crucial to public safety and welfare are provided to District residents and businesses.” Although DCRA shared the MOA with A&M, interviews with DCRA and FEMS staff indicated a lack of awareness of the MOA and its requirements.¹³

Due to the lack of responsibility and ownership of issues across District Agencies, A&M provides the following recommendations:

- a. DCRA should provide MPD and FEMS access to the central reporting system, allowing MPD and FEMS to verify if DCRA has received a complaint and performed an investigation.
- b. District Agencies should collaborate to develop a cross-agency reference guide identifying the most common violations in the District and identifying the responsible agency. This guide could also establish the appropriate contact point within each District Agency, based on the urgency and nature of the violation.

Note: A&M recognizes that the District Agencies have recently issued procedures that provide guidance on communication with other District Agencies. FEMS’ implementation of GO 502 (Complaint Procedures), effective August 23, 2019, establishes procedures for complaint referral to the appropriate agency. MPD EO 19-005, effective September 3, 2019, establishes procedures for reporting serious fire code violations to FEMS through OUC and subsequently to DCRA via email.

- c. The District Agencies and other DC Government agencies should consider implementing a policy requiring that the initial recipient of any complaint immediately register the complaint in the respective Agency’s central tracking database, subsequently following up with the designated contact of the appropriate District Agency.

Note: DCRA implemented the CPU SOP, effective September 13, 2019, requiring that the Program Analyst log the complaint in the QuickBase Investigations Module within one business

¹³ DCRA leadership has noted that the next update to the DC Building Code (currently in process) will make the MOA redundant.

day or allowing the complainant to directly enter the complaint into the CRM Module of the QuickBase System.

Systems Maturity and Utilization

0.3. DCRA should ensure appropriate use of systems across the agency.

DCRA employees rely on informal communications, via email, to route and track the process of investigation activities. DCRA has piloted a CRM system that is currently not being used effectively or to its full capabilities agency-wide. Due to the limited use and functionality of DCRA's systems, A&M recommends:

- a. DCRA should establish reporting protocol requiring that all DCRA employees immediately enter complaints received into CRM upon receipt of the complaint, subsequently forwarding the complaints to a centralized mailbox for a second check by DCRA's customer service department.
- b. DCRA should proactively inform the general public, FEMS, MPD, and other partner organizations on the most efficient way to route complaints – through a central email or direct entry into the CRM online tracking system – in order to reduce the reliance upon informal communication (email) within DCRA.

Note: DCRA has made effort to ensure the appropriate use of systems across the agency. DCRA provided documentation demonstrating a DCRA-wide implementation of the Pilot CRM system in February 2019. DCRA staff communicated their understanding that the CRM was not fully implemented at this time and was not consistently used to track cases.

0.4. FEMS should adopt procedures establishing appropriate systems use to support transparency and accountability.

FEMS uses Zoll inspection tracking system to track and coordinate complaints of violations and the related inspections. Currently, the Zoll inspection tracking system is only updated after an inspector has visited the property and there is no process to track complaints received but not responded to or inspected, leading to limited visibility and oversight. A&M recommends:

- a. FEMS should establish procedures requiring that all FEMS employees immediately enter complaints received into the Zoll tracking system upon receipt of the complaint (prior to inspector visiting the property), subsequently forwarding the complaints to a centralized email for a second check by the Administrative Officer for assignment.

Note: Effective August 23, 2019, FEMS' implemented GO 502 (Complaint Procedures), establishing level of review and approval required for complaints and referrals, documentation required, follow-up protocol with appropriate agency, and emergency procedures.

- b. FEMS should inform the general public, DCRA, MPD, and other DC Government agencies of the most efficient way to route complaints – through a central email or direct entry into an online tracking system – in order to reduce the reliance upon informal communication (email) at FEMS.

0.5. District Agencies should increase systems access and training within and across the agencies.

Communication, information, and systems access related to reported code violations are compartmentalized between groups within and across the District Agencies. Due to the lack of systems access, A&M recommends:

- a. DCRA should develop a central reporting system that both DCRA investigators and DCRA inspectors can access, allowing the groups to track code violations, inspections, and investigations at each address. DCRA should establish policies requiring that all investigators and inspectors review DCRA records prior to traveling to an address for inspection or investigation.

Note: Effective September 3, 2019, DCRA implemented the Property Maintenance Inspection SOP, requiring processing team members to search ACCELA records to determine if the property is a licensed rental property. It is also A&M's understanding that the Enterprise CRM, when fully implemented, will be able to pull information from all DCRA systems onto a single dashboard that would enable the user to view all information across the agency that is relevant to a particular property.

- b. DCRA should provide MPD and FEMS viewing access to the central reporting system, allowing MPD and FEMS to determine whether DCRA has received a complaint and performed an investigation.
- c. DCRA should explore the use of combination inspectors, inspectors that are trained in multiple disciplines and empowered to support inspections and investigations.
- d. MPD and FEMS should implement basic code training for the employees that routinely access properties and can encounter, identify, and report obvious code violations to the respective District Agency. This basic code training should establish reporting policies and procedures based on the urgency and nature of the code violation, as well as the required follow-up procedures.

0.6. DCRA should establish an audit log and user-based controls for CRM and QuickBase to increase transparency, oversight, and accountability.

DCRA's systems currently lack an audit log and user-based controls. The absence of an audit log inhibits DCRA's ability to evaluate organizational effectiveness, manage employees and their workloads, and identify actions previously taken. The absence of user-based controls within DCRA could allow DCRA

employees to circumvent policies, procedures, and lines of authority established by leadership. Due to the absence of key IT controls, A&M recommends:

- a. DCRA should ensure that an audit log capability is available for all systems used to increase transparency and accountability within the organization.
- b. DCRA should implement user-based controls within all systems used, establishing lines of authority and level of approval required for each task, increasing management's oversight of day-to-day operations.

Note: DCRA's new policies and procedures implemented on September 10, 2019 detail the documentation required to close cases and identify two DCRA employees with authority to close cases in the Investigations Module. A&M recommends DCRA implement automated user-based controls related to the two employees with authority to close cases in the Investigations Module.

DCRA Investigations Management

0.7. DCRA should evaluate staffing needs at all levels and adopt policies establishing training requirements for all administrative and management personnel.

Lack of continuity of DCRA investigations management personnel was a contributing factor that allowed 708 Kennedy to remain unresolved. Many personnel reported being overwhelmed with the workload or too busy with administrative tasks. Due to the lack of continuity of investigations personnel, A&M recommends:

- a. DCRA should consider performing a benchmark analysis against other metropolitan government agencies to determine where DCRA is understaffed.
- b. DCRA should mandate that all employees and investigators use the intended IT systems to open, track, manage, and close cases based on the appropriate level of authority.

0.8. DCRA should implement a robust formal training program for investigators.

DCRA has stated that it provides required trainings to all investigators based upon best practices for investigations, standard operating procedures, and issues identified through Program Manager / Program Officer review of investigative reports. Interviews with multiple DCRA investigators indicated that, at the time of the 708 Kennedy Fire, DCRA investigators had not received this type of comprehensive training but that they have subsequently received additional training through DCRA's eLearning service provider. To build upon the progress that DCRA has made in training its investigators, A&M recommends:

- a. DCRA should develop and distribute an SOP for investigators, documenting specific requirements and steps for performing investigations of code violations, reporting investigations of code

violations, documenting investigations of code violations, requirements & approval necessary for suspending investigations, and requirements & approval necessary for closing investigations.

- b. DCRA should implement a robust onboarding training and compliance program for investigators in order to standardize the investigations process, including requiring sufficient code knowledge and training prior to provisional registration of inspectors.

Note: DCRA implemented new policies and procedures via the Rental Property Complaints SOP, effective August 26, 2019, which establishes required investigation procedures including contacting the complainant, researching the owner and address, documenting the investigation, reporting the investigation, and completing the investigative report.

- c. DCRA should implement and require above-the-minimum continuing education for all DCRA investigators. DCRA should consider continuing education for all DCRA employees.

0.9. DCRA should adopt a prioritization protocol for triaging and responding to complaints.

DCRA did not have clear processes in place for prioritizing properties for investigation or inspection. DCRA does not have formal standards for identifying high-priority complaints unless the structure poses immediate threat of collapse. Due to the informal processes related to the prioritization of complaints, A&M recommends:

- a. DCRA should establish policies and procedures to address priority issues within short time periods, and then meet basic Service-Level Agreements (“SLAs”) for all other low-priority cases.
- b. DCRA should require mandatory fields in CRM and QuickBase systems to provide additional detail on the complainant of each case (e.g., MPD Officer, ANC Commission, Resident, etc.), allowing DCRA to leverage the additional information to establish case priority.
- c. DCRA should establish procedures requiring investigators and inspectors to review and summarize the property history of complaints in case report templates to ensure that the pattern of complaints and inspections at the property is considered when investigating the complaint.
- d. DCRA should further develop CRM and QuickBase systems to assign ownership of high-priority cases and complaints to multiple parties (investigators, inspectors, Fire inspectors, etc.).

0.10. DCRA should establish an internal audit function to track adherence to standardized mandatory reporting requirements.

DCRA has no internal audit function to oversee DCRA’s Investigations Division and no standardized reporting requirements. The lack of oversight over DCRA’s Investigations Division elevates the risk of

additional unresolved complaints. In order to track adherence to reporting requirements and increase management oversight, A&M recommends.

- a. DCRA should implement procedures establishing mandatory progress report updates in the QuickBase module to ensure DCRA employees are investigating cases in a timely matter with the appropriate level of service and documentation. The mandatory progress reports provide additional oversight and monitoring for DCRA management.

Note: DCRA's RIS team established an Investigative Report Submission Process, effective December 17, 2018, requiring that DCRA investigators extensively document investigations performed and establishing various levels of review prior to final report submission, increasing accountability and oversight. Though the establishment of this process was communicated to the DCRA investigators prior to the 708 Kennedy complaint, the DCRA 708 Investigator did not adhere to the outlined procedures. A&M recommends that DCRA strengthen the monitoring and accountability functions of the DCRA Program Manager and DCRA Program Officer to support the requirements outlined in the Investigative Report Submission Process.

- b. DCRA should establish mandatory fields in the investigation and inspection reports to ensure DCRA employees include consistent documentation in report submissions.
- c. DCRA should establish an internal audit function to monitor DCRA's Investigations Division and randomly sample cases to ensure proper adherence to SOPs and SLAs. DCRA's internal audit function should verify all inspectors are appropriately performing and documenting cases. DCRA's internal audit function will provide another level of oversight to identify unaddressed cases.

Unlicensed Property Oversight

0.11. DC Government should explore implementing new licensing standards requiring recurring inspections to proactively assist the code enforcement process.

DCRA relies heavily on landlords, neighbors, tenants, and members of the public to report complaints related to small business establishments. The system of self-reporting businesses puts DC residents and customers at risk and allows business owners to change their business offering or building configuration without a DCRA certification or inspection. As a result of the risk associated with a self-reporting code enforcement environment, A&M recommends:

- a. DC Government should explore opportunities to improve the BBL process through a combination of improved internal controls and integrated systems. DC Government should consider requiring verification of a CofO prior to the approval of a BBL.

BETWEEN DCRA, FEMS, AND MPD

- b. DC Government should consider pursuing legislative reform to empower DCRA to require mandatory inspections of any property issued a CofO or BBL every five-ten years. This process could be automatically triggered by DCRA's system of record.
- c. DCRA should consider improving its proactive efforts to identify unlicensed rentals, including community outreach, data mining, and analytics to generate leads for RIS investigations. Consider treating other licensing, investigations, or zoning activities as "triggers" for reinspection of business properties.

Compliance & Enforcement

CAP ID	ACCELA CAP Type	Description of Work / Request Comment	Date Filed	Inspection Action	Inspection Status	Case Status	Status Date	Comments
CFS1900028	Enforce/Compliance/Construction/Fire Safety	Fire safety inspection	9/18/2019	Insp Cancelled	Issue Citation	Inspection Scheduled	9/18/2019	See Appended Inspection Report
09-01344	Enforce/Compliance/Infraction/NA	CASE RECEIVED 9-21-09, PROCESS BY [NAME REDACTED] ON 9-22-09, VIOLATIONS TRASH AND WEEDS IN REAR YEARD***FINE AMOUNT \$1,000.00	9/22/2009	n/a	n/a	Case Canceled	4/1/2019	Via Script. This NOI is also defective because no time of the infraction was stated on the NOI. The time of the infraction must be entered on the NOI.
CTB0901546	Enforce/Compliance/Housing/Trash and Debris	Excessive grass, trash and debris, front and/or rear yards. Insp. Pick-up from Fix-It on 8/27/09 Insp [name redacted]	8/31/2009	Insp Completed	Not Abated	Case too old	9/15/2010	Inspection reveals the following. The weeds are greater than 10 inches in height along with trash and debris in the rear yard of this building that creates a harborage for rodents. Attached to this case is a photo of the existing violation. Attempt personal service at 1412 Whittier PL NW, no response. Recommend that this case be sent by certificate of mailing. Reinspection reveals the following. Items (1) and (2) have not been abated. Attached to this case is a photo of the existing violation. Recommend that this case be forwarded for assessment.
CTB0900627	Enforce/Compliance/Housing/Trash and Debris	Trash and debris - Occupants moved out, left backyard full of trash and debris	3/24/2009	Insp Completed	Cause	Cause for action	3/27/2009	An inspection of the premises revealed that the is an accumulation of trash and debris in the rear of this property a notice of violations has bee prepared for mailing.
CRM080923	Enforce/Compliance/Housing/Routine Maintenance	MAYOR'S WALKTHROUGH - shed/garage in rear. Unsafe & dilapidated. Debris	9/19/2008	Insp Completed	Abated	NOV Served - Mail	10/7/2008	A reinspection of the premises was conducted on 11/25/08. It revealed the following: all items pending have been abated, no items remain. I recommend that this case is closed.
CRM080905	Enforce/Compliance/Housing/Routine Maintenance	MAYOR'S WALKTHROUGH - DEFECTIVE SHED AND DEBRIS REAR	9/18/2008	Insp Completed	No Cause	No Cause	9/26/2008	duplicate inspection request.
CRM080683	Enforce/Compliance/Housing/Routine Maintenance	MAYOR'S WALKTHROUGH - DEBRIS, SHED, ROUTING MAINTENANCE	8/28/2008	Insp Completed	No Cause	No Cause	9/2/2008	An inspection of the premises conducted on 8/29/08 reveals the following: no violations found at this time. No cause for action.
ECC147412	Enforce/Compliance/Construction/Fire Safety	Gret Streets: Inspect for building code violations and violations within 360 degrees from property. Take pictures of code violations and forward to [name redacted] for downloading and return report to [name redacted]	7/3/2006	Insp Completed	Cause	Disapproved		unlicense truck dilapidating shed trash in rear of bldg. *JH8
ECC58246	Enforce/Compliance/Construction/Zoning	Rooming w/o C of O	3/12/2004	Insp Completed	Failed to Inspect	Disapproved		No one home.
ECC31321	Enforce/Compliance/Construction/Zoning	rooming house	6/25/2003	Insp Completed	Cause	Approved		c/n enter

Licensing

CAP ID	ACCELA CAP Type	Description	Date Filed	Inspection Action	Inspection Status	Case Status	Status Date	Comments
LAPP18003170	Licenses/Business License Application/NA/NA		1/30/2018	n/a	n/a	Approved	1/30/2018	
400318000782	Licenses/Business License/General Business/General Business Licenses		1/30/2018	n/a	n/a	Active	1/30/2018	
HO1800336	Building/Home Occupation/NA/NA	ONLINE SALES	1/29/2018	n/a	n/a	Permit Approved	1/29/2018	MU-4 ZONING DISTRICT. ZONING HOP APPROVAL FOR ONLINE SALES.
LAPP68003045	Licenses/Business License Application/NA/NA	Cigarette Retail	5/8/2008	n/a	n/a	Approved	9/26/2010	Updated by Script
68003045	Licenses/Business License/General Sales/Cigarette Retail	Cigarette Retail	5/8/2008	n/a	n/a	Expired	9/26/2010	
39501280	Licenses/Business License /Public Health Food Establish	Delicatessen	10/30/1999	n/a	n/a	Expired	9/24/2010	
LAPP39501280	Licenses/Business License Application/NA/NA	Delicatessen	10/30/1999	n/a	n/a	Expired	9/24/2010	Updated by Script

39209304	Licenses/Business License /Public Health Food Establish	Food Products	3/31/1992	n/a	n/a	Expired	10/2/2010
LAPP39209304	Licenses/Business License Application/NA/NA	Food Products	3/31/1992	n/a	n/a	Approved	10/2/2010 Updated by Script
LAPP39209305	Licenses/Business License Application/NA/NA	Cigarette Retail	1/1/1992	n/a	n/a	Approved	10/3/2010 Updated by Script
39209305	Licenses/Business License/General Sales/Cigarette Retail	Cigarette Retail	1/1/1992	n/a	n/a	Expired	10/3/2010

Note: A&M created this document using the ACCELA records for 708 Kennedy Street provided by DCRA. The ACCELA report was generated by DCRA on 9/23/2019. All name references have been removed.