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Testimony Before the District of Columbia Council
Committee on Public Works and Operations
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Public Hearing
B26-0287, The “Housing with Integrity Amendment Act of 2025”

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Introduction

Good morning, Chairperson Nadeau, and members of the Committee. My name is Patrick Cothorn, and I am a Policy Attorney at Children's Law Center. Children's Law Center believes every child should grow up with a strong foundation of family, health and education and live in a world free from poverty, trauma, racism and other forms of oppression. Our more than 100 staff – together with DC children and families, community partners and pro bono attorneys – use the law to solve children's urgent problems today and improve the systems that will affect their lives tomorrow. Since our founding in 1996, we have reached more than 50,000 children and families directly and multiplied our impact by advocating for city-wide solutions that benefit hundreds of thousands more.

Thank you for the opportunity to testify today regarding B26-0287, the Housing with Integrity Amendment Act of 2025 (the "Act"). Children's Law Center strongly supports the Act. We have long advocated for the District to better protect healthy housing for District residents because we know it is crucial for promoting stable, safe and healthy housing for low-income families.¹ Each year, we work with hundreds of families living in rental housing with poor conditions like pest infestations, water intrusion, and lack of heat that cause and exacerbate children's asthma and other health concerns; and lead to more emergency room visits, missed school for children, and missed work for parents.² The District's housing code is meant to protect against these conditions by setting minimum standards that landlords must comply with to maintain safe and

sanitary housing for their tenants.³ The housing code, however, is only as strong as its implementation and enforcement.

The proposed legislation seeks to hold housing providers with persistent serious unabated housing code violations accountable by denying their applications for a basic business license.⁴ Incorporating the District's existing knowledge of serious housing code violations into the business licensure process is an efficient way for the District to leverage existing knowledge and increase accountability for housing code violators, particularly as housing conditions and related enforcement efforts continue to fall short of expectations.⁵

Introducing such enforcement tools is necessary. Property owners have little cause for concern from the current primary enforcement path because the current housing code enforcement system is not functioning effectively. A significant backlog of housing code cases at the Office of Administrative Hearings (OAH) has delayed resolution and diminished the impact of enforcement efforts.⁶ All too often, emergency violations—those that should warrant immediate attention—remain unaddressed for extended periods, compromising the integrity of the enforcement process.⁷ Additionally, fines assessed for violations frequently go uncollected or the Alternative Resolution Team (ART) within the Department of Buildings (DOB) frequently settles cases for substantially less than the original fine amounts.⁸ These shortcomings reduce the deterrent effect of the housing code and weaken accountability for property owners who fail to maintain safe

and habitable housing. The proposed legislation would establish a reliable enforcement structure that serves as a genuine deterrent for laxity in housing maintenance and ensures property owners and managers implement the housing code as intended and provide all District residents with healthy housing.

To help ensure the Act meets its goals, we have several recommendations. My testimony will first discuss four amendments to the proposed draft to strengthen protections for District residents. My testimony will then address revising the included code violations to trigger enforcement action to more specifically identify those violations that go to life-safety concerns. Finally, my testimony recommends the Council strengthen existing enforcement processes to ensure that District residents receive the fully realized version of this Act.

Expanding the Scope and Increasing Clarity in Targeted Areas Will Strengthen the Proposed Legislation

The Act has a laudable vision that could be strengthened by expanding its scope, ensuring the target audience is readily identifiable, simplifying the triggering mechanism, and treating all housing providers similarly.⁹ We therefore urge the Committee to address each of these items with targeted adjustments to the proposed legislation.

The first of the four items is the scope of licensure actions. In its current form, the Act would apply only to the issuance of basic business licenses. Basic business licenses

may be issued or renewed. This Act's effectiveness is limited by applying only to issuances.

Second, District agencies will likely struggle to hold housing providers accountable given the current entity-registration requirements in place under District law. The Department of Licensing and Consumer Protection (DLCP) is not requiring registered entities to identify natural persons as beneficial owners, allowing some housing providers to hide their entities behind corporate names.¹⁰ This practice cannot continue if DLCP is to hold these noncompliant housing providers accountable.

Third, the trigger for enforcement within this Act has multiple variables.¹¹ This complexity will make the review process difficult to implement. We urge the Committee to consider a more straightforward approach that will make implementation easier and more effective.

Fourth, smaller-scale housing providers, those with fewer than ten units, are entirely exempt from the review proposed by this Act. Housing code violations of any kind are equally concerning no matter the size of the housing provider, and so we urge the Committee to reconsider this exemption.

License Renewal Must Be Included Within the Scope of This Act to Close a Loophole That Would Allow Bad Actors to Avoid This Enforcement Process.

Businesses in the District, including housing providers, must have an active license prior to operating, which must be periodically renewed.¹² While a license may be both issued and renewed,¹³ currently, the Act would apply only to the issuance of a basic

business license (“license” or “licensure”).¹⁴ The omission of renewals narrows the scope of the Act and allows landlords with properties with serious life-safety code violations to escape any additional scrutiny unless they seek to open a new business.¹⁵ We believe the scope of this Act should provide for enforcement action against landlords’ business that permitted code violations to accumulate. To accomplish this, the Act should also provide for licensure denial at the time of renewal.

The denial of an initial licensure within this draft appears intended to prevent a scenario of a landlord seeking to escape the existing code enforcement efforts by opening a new entity. The omission of licensure renewal from this Act would allow non-compliant housing providers to exploit the envisioned approach. Such a housing provider would need only to obtain their initial license and would suffer no repercussions under this Act for allowing their housing to fall into slum conditions, as there would be no opportunity to trigger the enforcement process proposed here – a denial of licensure –at the time of license renewal. Including renewal within this proposed act’s scope will bring clarity and forestall attempts to evade this enforcement.

District Entity Registrations Must Require Filers to List a Natural Person as a Beneficial Owner to Enable Implementable Enforcement.

Current District law requires businesses to name each qualifying beneficial owner while registering or renewing registration and to disclose basic information about them.¹⁶ While one could argue that the “each person” requirement of this statute already requires that DLCP obtain information on each natural person who is also a beneficial owner.

However, based on the information available within public records, DLCP has evidently interpreted the statute differently, and only requires that information for those entities who file a submission. A person could stymie enforcement efforts by holding their properties in an entity that nests within another entity, thereby allowing themselves to name only another entity as the beneficial owner.¹⁷ Out-of-District entities may also be a registered beneficial owner, or even the sole beneficial owner. This can make it effectively impossible to find the person or persons actually at the center of a housing enterprise, as either a great deal of research is needed to track down the actual humans at the center of the business (and District agencies need investigatory burdens to be reduced, not increased); or else it is simply impossible to determine.¹⁸

Without knowing which person to bring enforcement action against, the accountability for landlords envisioned by the Act cannot occur. We therefore recommend the Committee ensure District entity registration requirements include identifying the natural persons who are beneficial owners. There are several potential approaches, and we would welcome the opportunity to further discuss this with the Committee.¹⁹ Whichever tack is taken to obtain this additional information, genuine enforcement will necessitate ensuring the denial of licensure to the natural persons benefiting from properties in poor condition, and not simply the holding entities—or else an enterprising slumlord would need only to hide their interests and form a new LLC to continue their problematic practices.

This Committee Should Amend the Thirty-Percent Threshold to Ensure the Enforcement Process Is as Fair and Administrable as Intended.

As written, the Act requires that a housing provider meet or exceed a threshold distribution of violations to trigger enforcement action. That threshold requires at least thirty percent of units within the germane rental property have an unabated class one or class two violation present for more than ninety days.²⁰ We are concerned that the “thirty percent threshold” may treat tenants differently, both within individual buildings and across buildings. Within buildings, the thirty percent threshold devalues an individual’s experience until a critical mass joins those conditions.²¹ Across buildings, some residents will be protected by more frequent inspections by virtue of the size of their building.²²

This threshold will also incentivize landlords to distribute their resources to only some of their units, whether by explicit choice or implicitly by financial constraints.²³ This incentive will prompt landlords to create a hierarchy of units, explicitly or implicitly, an outcome at odds with fairness and the intention of the Act to rectify a broken enforcement process.

There are also many variables for the enforcing agencies to track, creating many demands on implementation that threaten the administrability of this approach. Implementing this system will be difficult as designed, because it will require a close level of monitoring for each housing provider. From the variables provided within this draft, there are a host of data points that DOB and DLCP will need to gather to facilitate enforcement efforts. For each housing provider, DOB will need to determine how many

units constitute more than thirty percent of the building, continuously monitor the number of violations at the property, which units those violations are within, what class those violations are assigned, and how long those violations have lingered unabated. Also consider that, at least from the publicly available information on DOB's dashboard,²⁴ it is not possible to find whether a given property's violation is within any specific unit for *all* violations – only for *open* violations. The relationship between the percentage variable and the ninety-days variable is also unclear.²⁵ With so many variables and considerations, there are many stress points within this enforcement system. DOB must have the capability to easily track this level of detail in their monitoring to ensure proper implementation.

In our review of how other jurisdictions approached enforcement for housing code violations, no nearby jurisdiction used such a complex approach to licensure denial or revocations based on code violations.²⁶ Some even allow for licensure revocation (whether explicitly or implicitly by authorizing “any other form of relief”) for a single lingering violation.²⁷

While this enforcement process supplements existing code enforcement efforts, the thirty percent threshold created an approach that is inconsistent with the stated purpose of the Act. The proposed legislation targets those who repeatedly do not abate serious code violations and recognizes serious shortcomings in the existing enforcement

process.²⁸ It cannot be that tenants suffering must extend to enough of their neighbors before this enforcement process may begin.

Housing providers who are concerned that they may face this enforcement process unjustifiably can find reassurance within the existing enforcement process underlying this proposal. The NOI enforcement system affords housing providers notice, rights, and the opportunity for hearing, and the right to seek judicial review of the result.²⁹

We, therefore, recommend amending the Act to include a dual approach to clarify the relationship between variables, eliminate the need to track which units have been affected, and include common areas and other non-unit portions of the building.³⁰

Amend the Act to Include Properties with Nine or Fewer Units Because a Housing Code Violation Is Equally Harmful to Tenants No Matter the Number of Units Within the Property.

The Act exempts housing providers from its scope if their property has nine or fewer units.³¹ We recommend amending the Act to include all housing providers regardless of the number of units within the building. A housing code violation is just as significant whether it is in a large complex with hundreds of units or a row home with a handful of units. Allowing class one or class two violations to linger for ninety days negatively affects all tenants, wherever they may live. Yet, the Act would exempt properties that have nine or fewer units, an exemption that suggests lingering code-violations are more troublesome or more-deserving enforcement if they occur in a larger property.

We can understand the intent to mitigate burdens on smaller housing providers. While we appreciate the operational difficulties that go into running a small business there is no support to conclude that this enforcement process would be too burdensome on smaller landlords relative to the burden imposed on larger landlords.³² Even if it were more burdensome for certain groupings of housing providers to comply with maintenance requirements, that concern is far outweighed by ensuring District tenants live in safe and healthy housing conditions.³³

There already exists a gap in housing conditions measurable by income levels.³⁴ We are concerned that exempting smaller-scale housing providers from this additional enforcement mechanism will exacerbate this issue, as existing resources are funneled into certain areas at the expense of others, for no reason other than the tenant happened to live in a rental property with fewer units. Exempting smaller properties also disincentivizes a property-owner from expanding their property, as keeping a building at a smaller size would be to avoid subjecting themselves to further operational risks. We urge the Council to refrain from legislating any changes that would disincentivize production of more housing stock as well as exempt any landlords from being held accountable. Therefore, we recommend the Council remove the exemption in the current version of the Act and instead include all landlords, regardless of the number properties they own.

A Specific List of Violations May Accomplish the Vision for this Act More Readily than References to Classes One and Two of the Housing Code.

The Act currently limits its reach to housing code class one or class two violations. Given the stated intent of the Act,³⁵ the Committee may consider building upon this approach in two ways: (1) specifically list each violation within its scope rather than reference classes and (2) include portions of the housing code and property maintenance code that deal with mold, and the more specific lead-based paint regulations also be included with this Act's scope as violations to be counted for purposes of potential license revocation. These amendments include more life-safety concerns.

Classes One and Two Do Not Directly Correspond with the Full Picture of Life-Safety Concerns.

As written, this Act applies only to housing code violations within classes one and two.³⁶ While classes one and two generally reflect the most serious code violations, they also contain some violations within that are less directly connected to an immediate life-safety risk.³⁷ We do not advocate for the exclusion of those less-immediate items, but identifies them to indicate that classes one and two are not as definitive in their groupings as this Act may envision. Additionally, there are serious code violations outside classes one and two which fit the spirit of this Act,³⁸ but which would not count towards the triggering mechanism. For example, a missing lock on an exterior door would not be within classes one or two but is a clear and immediate safety concern.³⁹

We recommend that this Act specifically list each violation within its scope rather than reference classes. Appendix I of this document provides the added housing code violations we recommend including.⁴⁰

The Act Should Include Property Maintenance, Mold, and Lead-Related Violations to Capture All Life-Safety Concerns.

DOB inspects and enforces both the housing code and the property maintenance code – both of which are complimentary of each other.⁴¹ The Act, as written, considers only housing code violations. Effective reduction of existing health and safety risks present in District housing necessitates the inclusion of maintenance, mold, and lead-violations for purposes of this proposed legislation.

Mold and lead are significant health concerns in the District,⁴² but neither are included within the scope of the Act, as they are not thoroughly regulated by the housing code and so do not appear in class one or class two of the housing code.⁴³ The property maintenance code has its own set of violations that DOB can issue citations for, and some of those violations can be used to cite unhealthy mold conditions.⁴⁴

Accordingly, we further recommend that violations of the portions of the housing code and property maintenance code that deal with mold, and the more specific lead-based paint regulations also be included with the Act's scope as violations to be counted for purposes of potential license revocation. Doing so would further incentivize property owners to abate mold and lead-paint violations on their own, just as the Act aims to incentivize self-abatement of housing code violations.⁴⁵ Including mold and lead

violations will also bring a degree of uniformity to the enforcement of health-related codes in housing. This will promote fairness and predictability in enforcement outcomes and will prompt collaboration and communication between the different agencies that all touch on housing.

The specific property maintenance code and lead-based paint violations we recommend that the Act include are listed within Appendixes II and III of this document.⁴⁶

Strengthening the Existing Enforcement Processes Will Compiement This Act's Effort to Address the Current Crisis in Housing Conditions.

While this proposed legislation would bring a welcome application of existing information to better protect healthy housing, overall enforcement efforts would benefit if the District refined the existing enforcement approaches. Joining those potential adjustments to this Act, or in later legislation, would best protect District tenants. The Act recognizes that there is a problem of enforcement within the District – in large part because there is little reason for housing providers to be wary of OAH.⁴⁷ These providers know that they can pay a fine and make it go away (at least until DOB inspects again), or they can settle the fine with DOB's ART for a fraction of the fine amount.⁴⁸ There is no further risk because imposing a fine is the extent of possible relief OAH may order, it is not authorized to mandate abatement of a violation or further constrain the ability of a bad-actor landlord to operate within the District.⁴⁹

There are several items this Committee may consider expanding. First, we recommend OAH administrative law judges (ALJs) to be authorized to include injunctive relief mandating abatement within their judgements.⁵⁰ Expanding the potential repercussions that may result from an OAH hearing will better prompt housing providers to rectify housing code violations before the enforcement process provided within this proposed legislation triggers. Similarly, OAH ALJs could be given authority to refer a violation to landlord-tenant court, who may in turn consider whether to deduct any owed rent.⁵¹ Another consideration to expand enforcement efforts would be for the Council to authorize the Office of the Attorney General (OAG) to dissolve LLCs, as many other jurisdictions permit.⁵²

The public dashboard provided by DOB makes clear that there is a significant backlog in processing cases once an inspection uncovers a violation.⁵³ That backlog indicates that both DOB and OAH need expanded resources to provide timely resolutions, whether it by resolving a case at OAH or by reaching a settlement initiated by ART. To do so, DOB needs funding and staff to facilitate a case processing pace matching the pace of cases generated by their inspectors. Having additional ALJs at OAH to hear housing code cases will facilitate efficiency as well.⁵⁴

Finally, we are concerned that revoking licenses under this proposed authority could create a class of unlicensed housing providers operating outside of District oversight and regulation. We recommend ensuring that District agencies, particularly

DOB and DLCP, have sufficient staffing and resources to ensure seamless implementation and monitoring of this Act.

Conclusion

Thank you for this opportunity to provide testimony. We support this proposed legislation and provide these suggestions to offer further improvements.

Appendix I: Additional Housing Code Violations to Include

D.C. MUN. REG. Citation	Description of Violation
16 D.C. MUN. REG. § 3305.3(c)	renting or offering to rent a habitation that is not clean, safe, and free of vermin and rodents
16 D.C. MUN. REG. § 3305.3(d)	owner fails to provide and maintain the required facilities, utilities and services
16 D.C. MUN. REG. § 3305.3(k)	failure to comply with the requirements of this section when altering any building in existence prior to June 9, 1960
16 D.C. MUN. REG. § 3305.3(l)	areaways constructed on buildings erected after June 9, 1960, does not comply with requirements of the International Code Council (ICC) International Building Code and Title 12 of the District of Columbia Municipal Regulations, the Construction Codes Supplement of 2003 and Zoning Regulations
16 D.C. MUN. REG. § 3305.3(m)	failure to properly or safely install, or maintain in a safe and working condition, a required facility
16 D.C. MUN. REG. § 3305.3(o)	providing a heating facility that does not permit the temperature to be maintained at or below the maximums established by 14 D.C. MUN. REG. § 501.3
16 D.C. MUN. REG. § 3305.3(t)	failure to provide required natural or mechanical ventilation for each habitable room*
16 D.C. MUN. REG. § 3305.3(u)	failure to comply with a requirement concerning the ventilation of habitable rooms
16 D.C. MUN. REG. § 3305.3(v)	failure to provide or maintain required openable area in case of mechanical ventilation failure*
16 D.C. MUN. REG. § 3305.3(w)	permitting a prohibited recirculation of air

16 D.C. MUN. REG. § 3305.3(x)	permitting air from prohibited locations to be drawn into a habitable room
16 D.C. MUN. REG. § 3305.3(y)	permitting a prohibited obstruction of ventilation*
16 D.C. MUN. REG. § 3305.3(z)	failure to properly install each facility, utility, or fixture
16 D.C. MUN. REG. § 3305.3(aa)	failure to maintain in a safe and good working condition a facility for cooling, storing, or refrigerating food
16 D.C. MUN. REG. § 3305.3(bb)	failure to comply with a requirement concerning plumbing facilities
16 D.C. MUN. REG. § 3305.3(cc)	failure to provide a lavatory, water closet and bathing facilities for each dwelling unit
16 D.C. MUN. REG. § 3305.3(dd)	failure to provide a sufficient number of bathing facilities
16 D.C. MUN. REG. § 3305.3(ee)	failure to comply with a requirement concerning water heating facilities
16 D.C. MUN. REG. § 3305.3(ff)	failure to maintain all structures located on a premise in a sanitary and structurally sound condition
16 D.C. MUN. REG. § 3305.3(gg)	failure to maintain a roof so that it does not leak, and so that rain water is properly drained there from*
16 D.C. MUN. REG. § 3305.3(hh)	Failure to provide a flue opening with a flue crock, or with a metal or masonry thimble
16 D.C. MUN. REG. § 3305.3(ii)	permitting to exist on premises a window, window frame, door, or door frame which does not completely exclude rain and substantially exclude wind
16 D.C. MUN. REG. § 3305.3(jj)	failure to comply with a requirement concerning stairways, steps, guardrails, or porches
16 D.C. MUN. REG. § 3305.3(ll)	premises creates a danger to the health, welfare or safety of the occupants, public and/or constitute a public nuisance
16 D.C. MUN. REG. § 3305.3(nn)	serious accumulation of trash, rubbish, or garbage in or on any premises shall

	constitute an insanitary and unhealthy condition
16 D.C. MUN. REG. § 3305.3(oo)	failure to afford protection against accident to a person in or about premises on which there is an unoccupied or uncompleted building
16 D.C. MUN. REG. § 3305.3(pp)	failure to submit fire inspection report or correct cited violations
16 D.C. MUN. REG. § 3305.3(qq)	permitting the accumulation of combustible junk
16 D.C. MUN. REG. § 3305.3(rr)	failure to properly notify the Fire Department of a fire
16 D.C. MUN. REG. § 3305.4(c)	failure to provide required occupant access to a bathroom or sleeping room
16 D.C. MUN. REG. § 3305.4(d)	failure to comply with a requirement concerning the ventilation of bathrooms*
16 D.C. MUN. REG. § 3305.4(e)	failure to maintain a mechanical ventilation system in safe and good working condition or in constant operation*
16 D.C. MUN. REG. § 3305.4(i)	failure to provide a required lock or key to a habitation door, or to maintain a lock in good repair
16 D.C. MUN. REG. § 3305.4(j)	failure to maintain a walkway in good repair, free of holes, and safe for walking purposes
16 D.C. MUN. REG. § 3305.4(o)	failure to keep a masonry wall pointed
16 D.C. MUN. REG. § 3305.4(s)	failure to construct or maintain a basement hatchway so as to prevent the entrance of rodents, rain, or surface drainage water into a dwelling
16 D.C. MUN. REG. § 3305.4(v)	failure to maintain an exit directional sign

* : violation goes to mold.

Appendix II: Property Maintenance Code Violations to Include

D.C. MUN. REG. Citation	Description of Violation
16 D.C. MUN. REG. § 3309.1	class 1 property maintenance code violations
16 D.C. MUN. REG. § 3309.2	class 2 property maintenance code violations
16 D.C. MUN. REG. § 3309.2.1(a)	failure to maintain exterior property and premises in clean, safe and sanitary condition*
16 D.C. MUN. REG. § 3309.2.1(b)	failure to maintain sidewalk, walkway, driveway, stairs or other walking surface safe for walking purposes
16 D.C. MUN. REG. § 3309.2.1(d)	failure to maintain structures and exterior property free from rodent harborage and infestation
16 D.C. MUN. REG. § 3309.2.1(k)	failure to maintain foundation wall
16 D.C. MUN. REG. § 3309.2.1(l)	failure to maintain exterior walls in a structurally sound condition
16 D.C. MUN. REG. § 3309.2.1(r)	failure to maintain windows, skylights and door frames
16 D.C. MUN. REG. § 3309.2.1(s)	failure to maintain exterior doors
16 D.C. MUN. REG. § 3309.2.1(t)	failure to maintain basement hatchway
16 D.C. MUN. REG. § 3309.2.1(u)	failure to provide proper basement hatchway lock
16 D.C. MUN. REG. § 3309.2.1(v)	failure to maintain interior surfaces in good repair*
16 D.C. MUN. REG. § 3309.2.1(z)	operator of a housing business permitting the accumulation of rags, waste paper, broken furniture or any combustible junk
16 D.C. MUN. REG. § 3309.2.1(kk)	failure to correct condition that cause infestation of non-residential structure
16 D.C. MUN. REG. § 3309.2.1(mm)	failure of owner to provide required extermination services
16 D.C. MUN. REG. § 3309.2.1(rr)	failure to provide proper natural or artificial ventilation*
16 D.C. MUN. REG. § 3309.2.1(ss)	failure to provide proper ventilation for bathroom or toilet room*

* : violation goes to mold.

Appendix III: Lead Violations to Include

D.C. MUN. REG. Citation	Description of Violation
16 D.C. MUN. REG. § 4003.1	class 1 lead-based paint violations
16 D.C. MUN. REG. § 4003.2	class 2 lead-based paint violations
16 D.C. MUN. REG. § 4003.3	class 2 lead-based paint violations
16 D.C. MUN. REG. § 4003.4(c)	failure to prevent dispersal of paint dust, chips, debris, or residue, or increasing the risk of public exposure to lead-based paint
16 D.C. MUN. REG. § 4003.4(d)	failing to comply with residential property renovation requirements under 40 C.F.R. § 745.80 through 745.92
16 D.C. MUN. REG. § 4003.4(j)	failure to perform a clearance examination following work that required a renovation permit
16 D.C. MUN. REG. § 4003.4(k)	failure to have a clearance examination conducted by a required person
16 D.C. MUN. REG. § 4003.4(q)	failure to disclose information about lead-based paint, lead-based paint hazards, and pending actions to a purchaser or tenant of a dwelling unit constructed before 1978
16 D.C. MUN. REG. § 4003.4(r)	failure to provide required disclosures to a purchaser or tenant to purchase or lease a dwelling unit as required
16 D.C. MUN. REG. § 4003.4(s)	failure to provide lead disclosure form and clearance report for units that will be occupied or regularly visited by a child under the age of six (6) or pregnant woman, before tenant is signs a lease for the unit
16 D.C. MUN. REG. § 4003.4(t)	failure to timely provide clearance report for a dwelling unit for which a tenant has notified the owner that a person at risk resides or regularly visits
16 D.C. MUN. REG. § 4003.4(u)	failure to provide tenants with notice of their rights whenever a tenant executes or renews a lease or the owner provides notice of a rent increase

16 D.C. MUN. REG. § 4003.4(v)	failure to notify a tenant within ten (10) days of the presence of lead-based paint and to provide a Lead Warning Statement or lead hazard information pamphlet
16 D.C. MUN. REG. § 4003.4(y)	failure to provide a prospective tenant with a clearance report, if tenant informs property owner that the household will include a pregnant individual or a child under six (6) years of age
16 D.C. MUN. REG. § 4003.5(b)	failure to provide, upon written request by a tenant who is pregnant or has a child under six (6) years of age, a clearance report issued within twelve (12) months of the request
16 D.C. MUN. REG. § 4003.5(f)	failure by owner of “lead-free unit” to disclose the presence of enclosed lead-based paint
16 D.C. MUN. REG. § 4003.5(k)	undertaking the raze or demolition of a pre-1978 building without a lead abatement permit as required
16 D.C. MUN. REG. § 4003.5(l)	failure to use approved encapsulation products
16 D.C. MUN. REG. § 4003.5(n)	failure to conduct a timely clearance examination and repeat examination until a passing clearance report is issued
16 D.C. MUN. REG. § 4003.6(c)	failure to address underlying condition of the property that has caused the failure of the clearance examination

¹ See e.g., Makenna Osborn, CHILDREN’S LAW CENTER, Testimony Before the District of Columbia Council Committee of the Whole (Feb. 25, 2025), *available at* [DOB-Performance-Oversight-2025-Childrens-Law-Center-Written-Testimony-02.25.2025.pdf](https://www.dccouncil.gov/documents/2025/02/25/DOB-Performance-Oversight-2025-Childrens-Law-Center-Written-Testimony-02.25.2025.pdf).

² Children’s Law Center’s innovative medical legal partnership, Healthy Together, places attorneys at primary care pediatric clinics throughout the city with Children’s National, Unity Health Care, and Mary’s Center to receive referrals from pediatric providers for assistance with non-medical barriers to a child’s health and well-being. See Children’s Law Center, *available at*: <https://childrenslawcenter.org/our-impact/health/>. When unaddressed housing code violations are harming a child’s health, our attorneys represent clients in the Housing Conditions Calendar of the DC Superior Court, where tenants may sue landlords for housing code violations on an expedited basis and seek the limited relief of enforcing compliance with the housing code. See Housing Conditions

Calendar, <https://www.dccourts.gov/services/civil-matters/housing-conditions-calendar>. Through our work in Healthy Together we know how disruptive a child's health problems are to a child's entire family. For example, when a child needs to go to the ER for uncontrolled asthma, it typically means that the child will miss school, their parent will miss work – losing valuable income, and the family must take on unbudgeted costs for transportation and medication – all of which disrupts the family's stability.

³ 14 D.C. MUN. REG. §§ 400 – 899.

⁴ B26-0287, *Housing with Integrity Amendment Act of 2025* § 2, line 31

⁵ Council of the District of Columbia, Committee of the Whole, Committee Report, *Report on The District's Housing Code Inspection Process: Broken and In Need of Repair* (Jan. 18, 2024), 1, available at <https://lims.dccouncil.gov/Hearings/hearings/211> (Committee of the Whole report listing findings that the current housing code inspection process contains “unnecessary delays,” and that violations “are not abated within the time frames required by notices of infraction.”); Morgan Baskin, DCIST, ‘Broken and in Need of Repair’: D.C. Council Audit Finds Fault in Housing Inspections System, (Jan. 19, 2024) available at: <https://dcist.com/story/24/01/19/dc-council-audit-housing-inspections/> (news article reporting on the report cited immediately prior and adding additional context); Anne Cunningham, Children's Law Center, Testimony Before the District of Columbia Council Committee of the Whole (Oct. 31, 2018), available at https://childrenslawcenter.org/wp-content/uploads/2021/07/CLC-Testimony-Housing-Code-Enforcement-Dahlgreen-Courts-Case-Study-by-ODCA_0.pdf (testimony that DOB's predecessor agency, DCRA, experienced the same issues. “

⁶ Department of Buildings (DOB), Public Dashboard, available at <https://dob.dc.gov/page/agency-performance-dob> (the “Enforcement” sub-dashboard shows that in FY 2025, 16,135 Notices of Infraction were issued. Of those, 10,780 Notices of Infraction, with a collective face value over \$31 million, remained open and are awaiting adjudication at OAH as of October 9, 2025. Note that 10,780 open NOIs does not necessarily mean that OAH must hold 10,780 hearings to clear the FY25 backlog. While OAH could theoretically hear each NOI as a separate case at OAH, the court will inevitably resolve some cases without a hearing (whether they dismissed, settled, or joined with other NOIs into one hearing). Nonetheless, the sizable number of cases that are open and awaiting a hearing is a clear backlog. *See also* Eleni P. Christidis, Legal Aid DC, Testimony Before the District of Columbia Council Committee of the Whole, 5 (Feb. 25, 2025), available at <https://www.legalaiddc.org/media/4222/download?inline> (providing figures looking back to 2018). Council of the District of Columbia, Committee of the Whole, Committee Report, *Report on The District's Housing Code Inspection Process: Broken and In Need of Repair* (Jan. 18, 2024), 29-30, available at <https://lims.dccouncil.gov/Hearings/hearings/211> (providing figures and analysis of a backlog of cases filed at OAH).

⁷ *See* Christidis, *supra* n. 6 at 3-4.; Makenna Osborn, CHILDREN'S LAW CENTER, Testimony Before the District of Columbia Council Committee of the Whole, 4-5 (Jan. 18, 2024), available at <https://childrenslawcenter.org/wp-content/uploads/2024/01/DOB-Rental-Housing-Code-Inspection-Hearing-Childrens-Law-Center-Written-Testimony-With-Attachments-1.17.2024.pdf> (detailing the experience of a CLC client in seeking emergency assistance from DOB).

⁸ Department of Buildings, FY 2025 Performance Oversight Responses, response to Q 39, available at <https://dccouncil.gov/wp-content/uploads/2025/02/DOB-2025-Performance-Oversight-Pre-Hearing-Responses.pdf> (showing that between 10/1/2024 and 2/1/2025, DOB's Alternative Resolution Team (ART)

settled 5,212 Notices of Infraction. Collectively those cases had an original fine amount of just under \$13 million, but ART settled those cases for a collective amount less than a quarter of a million dollars).

⁹ Note that, in a past version of this legislation (B25-0574, *Do Right by DC Tenants Amendment Act of 2023*), did not generate these same concerns, given its more tenant-friendly language.

¹⁰ CLC can provide examples sourced from public records if requested.

¹¹ B26-0287 § 2.

¹² DC CODE § 47-2851.02(a) (requiring licenses); 14 D.C. MUN. REG. §§ 200.3 (same); DC CODE § 47-2851.07(c) (establishing the period during which initial licenses are valid for a period of six months to two years); DC CODE § 47-2851.04(a) (providing two options for license-period and setting fees for them – six months and two years); DC CODE § 47-2851.04(b) (providing that an initial license for a period of six months may be renewed one time for an additional six months, after which the license must be renewed for two years, and two year licenses must also be renewed for two-year licenses). *See also* DC CODE § 47-2851.03(a)(9) (establishing a category of licenses for housing and lodging services); 14 D.C. MUN. REG. ch.2 (regulatory provisions regarding licensure for housing providers).

¹³ DC CODE § 47-2851.02(b). Note that the DC Code defines neither “issue” nor “renew” within the applicable chapter or subchapter, so the general understanding should be given to those terms. *See* DC CODE § 47-2851.01 (omitting such definitions).

¹⁴ B26-0287 § 2, line 31.

¹⁵ “Life-safety” is not a term defined within District regulations and is not a term that has a clear relationship with the classes of housing code violations. *See* 14 D.C. MUN. REG. § 105; 16 D.C. MUN. REG. § 3101 (omitting such definitions). DOB’s website indicates that it issues “emergency” Notices of Infraction (“NOIEs”) for life-safety concerns (DOB, Notice of Infraction, *available at* <https://dob.dc.gov/noi>), but NOIEs is also not a defined term within District regulations. *See* 14 D.C. MUN. REG. § 105; 16 D.C. MUN. REG. § 3101 (omitting such definitions). The housing code is organized according to classes of violations, and District regulation defines the severity of each class. 16 D.C. MUN. REG. § 3200.1. Health and safety are items mentioned within classes one through five (with severity decreasing as the class number rises), but this Act would only include classes one and two – omitting classes three, four, and five, which are defined to affect health and safety.

¹⁶ DC CODE § 29-102.01.

¹⁷ Consider that a natural person looking to conceal their interest in entity X could hold entity X within entity Y and would thereby be compliant by simply listing entity Y as the beneficial owner. The hypothetical non-compliant landlord could repeat this process indefinitely to conceal their interest behind layers of filings. For a natural person with interests in multiple properties, they could hold each property within its own chain of entities, and transfer properties between and among them, obfuscating interests, and derailing enforcement efforts. *See also* James Horner, Note, *Code Dodgers: Landlord Use of LLCs and Housing Code Enforcement*, 37 YALE L. & POL’Y REV. 647 (2019).

¹⁸ CLC can provide examples sourced from public records if requested.

¹⁹ There are several ways to approach this. One is to mirror the federal Corporate Transparency Act (CTA) (Codified at 31 U.S.C. § 5336, implemented by regulation at 31 C.F.R. part 1010). The CTA gives a ready example of alternative language that is effective at including natural persons. 31 U.S.C. § 5336(a)(3). The required information (specified at 31 U.S.C. § 5336(b)(2)) that must be provided on beneficial owners is like the information required by DC, although the CTA also requires filers to disclose their date of birth—which suggests that natural persons are included. While implementing the CTA by regulation, the Department of the Treasury also understood filed entity reports must name natural persons under the CTA. *See also Beneficial Ownership Information Reporting Requirement Revision and Deadline Extension*, 90 Fed. Reg. 13688, 13690 (Mar. 26, 2025) (an interim final rule published by FinCEN describing the reporting requirements as they relate to individual natural persons). The specific provisions of the CTA that we recommend the Committee adopts are the CTA’s use of “individual” rather than “person.” Note however that FinCEN has recently narrowed the scope of the federal CTA. In March 2025, FinCEN published an interim final rule that narrowed the scope of the CTA to cover only foreign entities. *Beneficial Ownership Information Reporting Requirement Revision and Deadline Extension*, 90 Fed. Reg. 13688 (Mar. 26, 2025). The statutory scheme does not follow that model, and were the District to adopt the statutory model, there would be no need and no requirement to adopt FinCEN’s regulations—an approach New York is taking. *See* Sasha A. Pezenik & Luisa A. Nin Reyes, COLE SCHOTZ, P.C., *NY LLC Transparency Act*, (Oct. 7, 2025), <https://www.coleschotz.com/ny-llc-transparency-act/>.

Another approach is to amend the required disclosures within the beneficial owner report to include to include a date of birth (current requirements are at DC CODE § 29-102.01(a)(5)). One could argue that the “each person” requirement of the filing authority already requires that DLCP obtain information on each natural person who is also a beneficial owner. DC CODE § 29-102.01(a)(6). However, in practice, filers routinely omit natural persons from filings. Requiring the report to include a date-of-birth, like the CTA does, would prompt greater inclusion of natural persons within filings, as only natural persons have a date of birth.

Third, the Code could be amended to provide that, if the beneficial owners of the filing entity are or include an entity or entities, that the filing must include a chart mapping the ownership interests.

²⁰ B26-0287 § 2, lines 29-36. For comparison, the analogous triggering mechanism in the Do Right by Tenants Act of 2023 used a hard-count of five violations within the rental property as its threshold rather than a percentage-of-units. B25-0574 § 2, lines 39-42.

²¹ Unfairness within buildings is present as the thirty percent threshold inherently tolerates tenants living with any number of life-safety violations for any amount of time, with this enforcement not triggering until the issue begins to affect more tenants. Consider that this Act does not account for a property hosting a small number of units each with many violations, meaning that the thirty percent threshold allows theoretically a limitless number of violations within each unit to build up and to remain in place indefinitely, so long as seventy percent or more of units are compliant. Considering only in-unit violations also prevents consideration of code violations within common or communal areas, or other non-dwelling areas of the property, an outcome suggesting that violations that affect all tenants are less concerning than those that affect an individual unit.

²² Unfairness between buildings will also occur. Tenants living in buildings with fewer units will have greater protection, as this enforcement will trigger faster for them than their neighbors living in a building with more units. A building with twenty or fewer units will only need a single-digit number of affected units before enforcement under this Act triggers, while a larger building with one-hundred units

will require thirty affected units, and the disparity grows as the size of a given property increases. An enforcement process that is faster triggering for some is inequitable. Because the severity of a tenant's experience is not correlated with or otherwise connected to the size of their building, a scheme relying on that variable is not the best protection for District tenants.

²³ This will occur as a housing provider facing the potential loss of their business license would see the thirty-percent threshold and find that they can protect their licensure by ensuring that at least seventy-one percent of their units are free of long-lasting Class One or Two violations. Said differently, this system incentivizes packing violations into a small number of units, allowing landlords to neglect the worst units while prioritizing the better units for maintenance.

²⁴ See n. 2, *supra*.

²⁵ To elaborate, how will a DOB figure decide whether the percentage threshold of a given building is satisfied while also considering the ninety-day requirement? Must a building have more than thirty percent of its units all be in violation for simultaneously for ninety days? Or is DOB to consider each unit independently, and act when thirty percent of units meet the ninety-day condition, even if not at the same time? What if, as time passes, all units routinely have Class 1 or 2 violations in place for more than ninety days, but there is never a point in which thirty percent of units are so?

²⁶ ANNE ARUNDEL COUNTY CODE § 15-1-105; MONTGOMERY COUNTY CODE § 26-15(a); BALTIMORE CITY CODE art. 13, § 5-15(b)(6); CITY OF ALEXANDRIA CODE § 9-1-32; FAIRFAX COUNTY CODE § 61-7-1.

²⁷ *Id.*

²⁸ Janeese Lewis George, Statement of Introduction Housing with Integrity Amendment Act of 2025 (June 16, 2025) *available at* <https://lims.dccouncil.gov/downloads/LIMS/57982/Introduction/B26-0287-Introduction.pdf?Id=215187>.

²⁹ Department of Buildings, How Compliance is Enforced, *available at* <https://dob.dc.gov/sites/default/files/dc/sites/dob/DOB%20Enforcement%20Graphic%201.9.23.pdf>.

³⁰ The first approach should be to identify whether a certain number of qualifying violations occur at a property owned by the person. Specifically, we suggest this to be five qualifying violations within a rolling ninety-day period. The second part of the approach should be to assess simultaneously how many violations are in place for more than ninety days. We specifically recommend that if there are ten or more qualifying violations in place that are all unabated at the same time. This dual approach of holding landlords accountable for having five qualifying violations within a rolling ninety-day period or who have ten qualifying violations that are all unabated at the same time accomplishes the needed changes.

³¹ B26-0287 § 2, line 33.

³² While one may say that a larger housing provider has more resources to use, a larger housing provider supports more units. A decrease in the scope of required maintenance correlates with and mitigates any decrease in resources experienced by a smaller provider. See Brett Theodos et. al., URBAN INSTITUTE, *The Challenges Facing Small or Emerging Multifamily Housing Developers and Strategies to Overcome Them*, (Sep. 2025) *available at* https://www.urban.org/sites/default/files/2025-09/The_Challenges_Facing_Small_or_Emerging_Multifamily_Housing_Developers_and_Strategies_to_Overcome_Them.pdf (detailing many barriers that smaller housing providers face in entering the market

and operating successfully relative to their larger competitors); Laurie Goodman & Edward Golding, Urban Institute, *Institutional Investors Have a Comparative Advantage in Purchasing Homes That Need Repair*, (Oct. 20, 2021), <https://www.urban.org/urban-wire/institutional-investors-have-comparative-advantage-purchasing-homes-need-repair> (noting the financial resource advantages held by institutional housing providers).

³³ Consider also that applying uniform standards to all landlords is of value itself that mitigates the concern of making this too burdensome on small landlords. Uniform application of regulatory requirements will correspond with more predictable outcomes and experiences for all tenants, a goal that outweighs the concern of increased operational risk exposure by small landlords. Howard Latin, *Ideal versus Real Regulatory Efficiency: Implementation of Uniform Standards and 'Fine-Tuning' Regulatory Reforms*, 37 STAN. L. REV. 1267 (1985).

³⁴ Michael Neal et. al., URBAN INSTITUTE, *Implications of Housing Conditions for Racial Wealth and Health Disparities*, (Jan. 2024), available at https://www.urban.org/sites/default/files/2024-01/Implications%20of%20Housing%20Conditions%20for%20Racial%20Wealth%20and%20Health%20Disparities_0.pdf.

³⁵ Lewis George, n. 27, *supra*.

³⁶ Class 1 violations are “[e]gregious infractions that result from flagrant, fraudulent, or willful conduct, or unlicensed activity, or that are imminently dangerous to the health, safety, or welfare of persons within the District of Columbia;” Class 2 violations are “[o]ther serious infractions that result from flagrant, fraudulent, or willful conduct, or unlicensed activity, or that are imminently dangerous to the health, safety, or welfare of persons within the District of Columbia.” 16 D.C. MUN. REG. §§ 3200.1(a)-(b).

³⁷ For example, any person trying to repair a building after the end of the allowed period or interfering with an authorized agent, and removal of a placard by an unauthorized person are all Class 1 violations. 16 D.C. MUN. REG. §§ 3305.1(c), (e). While those are serious concerns, they do not have the same immediacy behind those concerns as some of the other Class 1 violations, such as a failure to maintain fireproofing or a failure to maintain a fire alarm. 16 D.C. MUN. REG. §§ 3305.1(j), (n).

³⁸ The Housing Code includes a policy section stating, in reference to all violations of the provisions of the Code, that the violations “cause specific, immediate, irreparable and continuing harm to the occupants of these habitations ... damage the quality of life and the mental development and well-being of the occupants, as well as their physical health and personal property, and this harm cannot be fully compensated for by an action for damages, rescission or equitable set-off for the reduction in rental value of the premises.” 14 D.C. MUN. REG. §§ 101.3-101.4.

³⁹ It instead could be either a Class 3 or Class 4 violation. 16 D.C. MUN. REG. §§ 3305.3(ss), 3305.4(i).

⁴⁰ The citations for the suggested items to include are 16 D.C. MUN. REG. §§ 3305.3(c)-(d), (k)-(m), (o), (t)-(jj), (ll), (nn)-(rr); 16 D.C. MUN. REG. §§ 3305.4(c)-(e), (i)-(j), (n)-(o), (s), (v).

⁴¹ DC CODE § 10-561.07(a)(4)(B).

⁴² Council of the District of Columbia Committee of the Whole, Report on Bill 23-132, “Residential Housing Environmental Safety Amendment Act of 2020 (December 1, 2020), p.4, available at: https://lims.dccouncil.gov/downloads/LIMS/41819/Committee_Report/B23-0132-

Committee_Report3.pdf?Id=115313 (“Indoor mold is a threat to the health and well-being of tenants in the District, particularly tenants with asthma and other chronic respiratory conditions. This bill will strengthen the District’s enforcement of indoor air quality by requiring housing code inspectors to be certified in indoor mold assessment and establishing penalties for when property owners fail to remediate indoor mold.”); Bruce Perrin Lanphear, et. al., American Academy of Pediatrics Council on Environmental Health Prevention of Childhood Lead Toxicity, 138 PEDIATRICS 1, 1-5 (July 1, 2016), *available at* <https://nmtracking.doh.nm.gov/contentfile/pdf/health/poisonings/lead/PreventionofChildhoodLeadToxicity.pdf> (“very high blood lead concentrations (eg, >100 µg/dL) can cause significant overt symptoms, such as protracted vomiting and encephalopathy, and even death ... Low-level lead exposure, even at blood lead concentrations below 5 µg/dL (50 ppb), is a causal risk factor for diminished intellectual and academic abilities, higher rates of neurobehavioral disorders such as hyperactivity and attention deficits, and lower birth weight in children ... [and] can result in decrements in cognitive functions ... No effective treatments ameliorate the permanent developmental effects of lead toxicity ... No therapeutic interventions currently exist for low blood lead concentrations; therefore, prevention of exposure is paramount.”)

⁴³ The statutory provisions are within chapters 2A (lead) and 2B (mold) of title 8 of the DC Code, and the implementing regulatory provisions are spread throughout the D.C. Municipal Regulations.

⁴⁴ See DC CODE 8-241.05(a)(1).

⁴⁵ Lewis George, n. 27, *supra*.

⁴⁶ As with the housing code violation suggestions, we recommend collaboration with District agencies, advocacy organizations, and members of the public for more feedback on which violations to include.

⁴⁷ Lewis George, n. 27, *supra*.

⁴⁸ See n. 6, *supra*.

⁴⁹ See DC CODE § 2-1831.09 (omitting such relief from the list of powers authorized to OAH ALJs).

⁵⁰ While OAH has the authority to issue “interlocutory orders,” that term does not include final orders, (DC CODE § 2-1831.01(10)), and so likely means that OAH has only the authority to issue a TRO or a preliminary injunction for the duration of the case, but not to include injunctive relief as an item within an issued final order. Expanding OAH’s authority to specifically allow injunctive relief as a permissible part of a final order, and not merely an interlocutory one, better positions OAH to address lingering code violations. The District’s Housing Code provides an express written policy consistent with this understanding, a policy “in favor of speedy abatement of the public nuisances ... if necessary, by preliminary and permanent injunction issued by Courts of competent jurisdiction.” 14 D.C. MUN. REG. § 101.5.

⁵¹ Financial penalties are an effective means of deterrence. Vikas Kumar Jaiswal, *The Influence of Loss Aversion and Reference Points on Financial Decision-Making: A Behavioural Economics Perspective*, 4.7 INT’L J. RES. PUB. & REV. 1852 (July 2023) (describing how risk aversion and a bias to feel losses more strongly than gains, individuals are more responsive to potential negative consequences); Anne Morrison Piehl & Geoffrey Williams, NAT’L BUREAU ECON. RSCH., Working Paper 16476, *Institutional Requirements for Effective Imposition of Fines* (Oct. 2010), *available at* <http://www.nber.org/papers/w16476> (explaining how financial sanctions serve as an effective deterrence for most violations of law, except for the most serious criminal violations). Taking that principle to promoting housing providers to maintain healthy housing,

this Act could limit the ability of bad actors to collect rent. We recommend adding a referral mechanism, allowing OAH to refer matters to landlord-tenant court. The Housing Conditions Court should then promptly issue a show-cause order, requiring the housing provider to show cause as to why the cost of repairs should not be deducted from the affected tenant's or tenants' rent. A similar referral and show-cause process is already in place, with respect to referrals by OAH to the Superior Court about noncompliance with an OAH interlocutory order or order. DC CODE § 2-1831.09(e).

⁵² While this would be a significant enforcement option, we make this recommendation envisioning the District with means to hold accountable those few housing providers who brazenly disregard District law and permit unhealthy housing to fester. While the denial of a basic business license would be a significant barrier for a housing provider to operate in the District, it would not prevent a housing provider from attempting to operate unofficially and would not prevent a recalcitrant housing provider from shuttering their building—removing potentially salvageable housing stock from the District. A judicial dissolution and judicially directed winding-up in such instances would mitigate the chances of such developments.

Many housing providers hold their properties within a corporation or an LLC. For housing providers looking to “avoid the full brunt of housing code enforcement,” placing each property in a separate LLC is an attractive choice. Horner, n. 17, *supra*.. Other jurisdictions have authorized the same. *See e.g.*, TENN. CODE ANN. §§ 48-245-902; 48-249-617; N.H. REV. STAT. §§ 304-C:135, 304-C:134, III. The District also already has a similar authority for corporations. DC CODE tit. 29, ch. 3, subch. XII, pt. B. Note also that while there is a set of generally applicable grounds for the Mayor to order the administrative dissolution of an entity, those grounds are only for failing to pay fees or penalties for five months after being due, failing to file a required report for five months after being due, or failing to have a registered agent for more than 60 days. DC CODE §§ 29-106.01-106.02.

⁵³ *See* n. 5, *supra*.

⁵⁴ Department of Building Office of Strategic Code Enforcement, Fiscal Year 2024 Annual Report, 9, *available at* <https://dob.dc.gov/sites/default/files/dc/sites/dob/DOB%20FY2024%20Strategic%20Enforcement%20Report.pdf> (stating that because of the routine duration of OAH, “collection takes many months if not longer”); Department of Building Office of Strategic Code Enforcement, Fiscal Year 2023 Annual Report, 5, (Feb. 24, 2024) *available at* <https://dob.dc.gov/sites/default/files/dc/sites/dob/2024-02-26%20OSCE%20Yearly%20Enforcement%20Report.pdf> (stating that “the issuance of additional final orders [by OAH] will move the collections process further and increase recovery,” and that “when the adjudication process moves more quickly, DOB’s fine collections increase”). Additionally, both DOB and OAH need the resources to obtain and implement an effective case/docket management system with streamlined filing procedures. As it stands now, it is a laborious process for DOB to send a complete record to OAH, and the filing system is reliant on emails. Hearings are often conducted by telephone—not virtually or in person. This creates a degree of inaccessibility compared to other District Courts, such as Housing Conditions Court (which is available to view online) and that relative inaccessibility makes it difficult for the public and impacted residents to observe proceedings, whether they are personally impacted by the case or be an interested party.