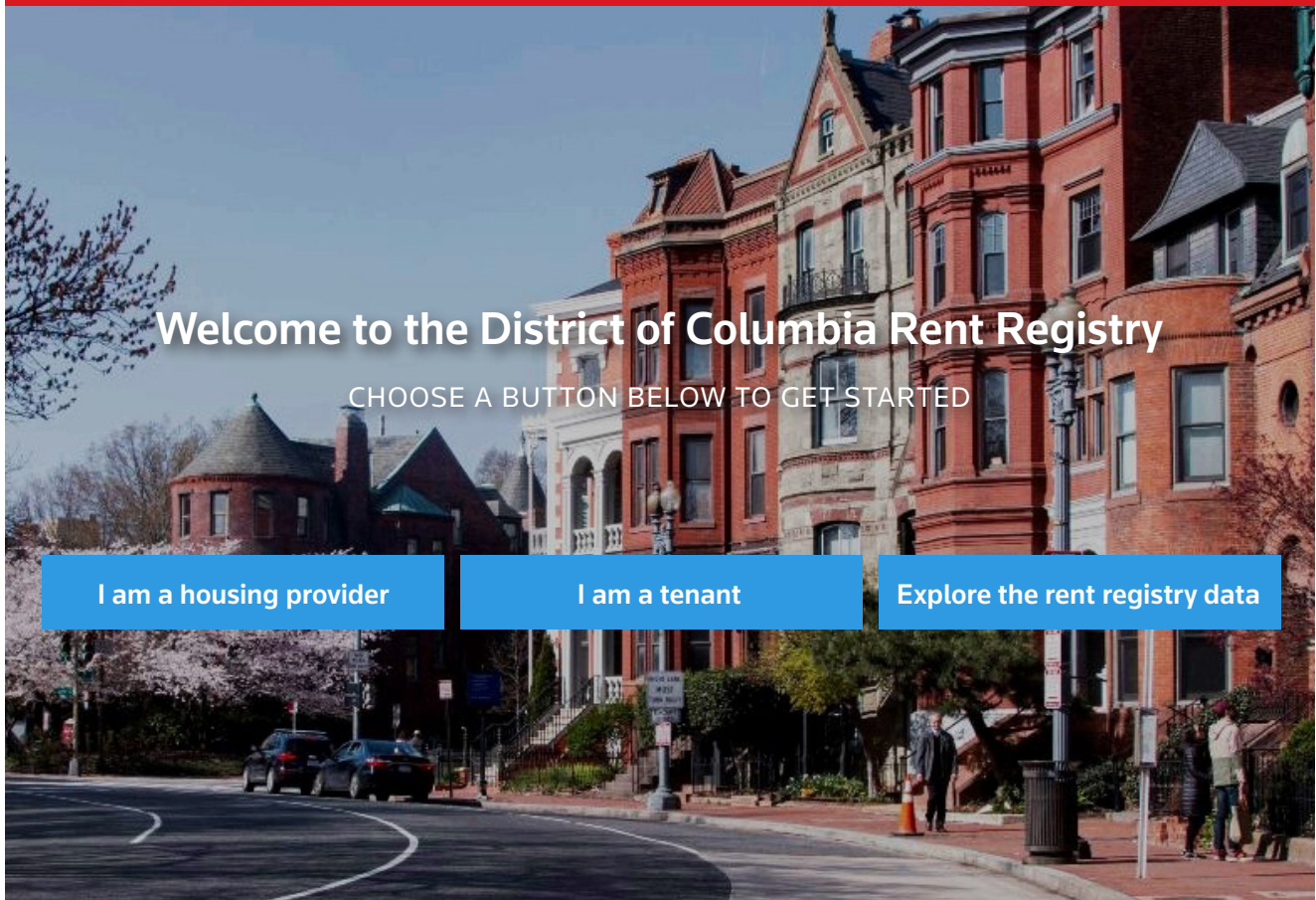


# D.C.'s New Rent Registry: A Decade of Delay

September 19, 2025

A report by the Office of the District of Columbia Auditor



I am a housing provider

I am a tenant

Explore the rent registry data



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# Executive Summary

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## Why ODCA Did This Audit

ODCA conducted this discretionary audit of the Department of Housing and Community Development (DHCD), the Office of the Tenant Advocate (OTA), and the Office of Contracting and Procurement (OCP) to determine the extent to which the District has implemented the Rent Control Housing Clearinghouse Amendment Act of 2015 and subsequent related legislation. In addition, ODCA compared the anticipated features and functionality of the District’s Rent Control Clearinghouse to rent control registries/databases implemented in similar jurisdictions.

## What ODCA Found

- OTA’s and DHCD’s Contract Administrators lacked previous IT project management expertise, were not afforded regular guidance and support from Office of the Chief Technology Officer (OCTO) subject matter experts and often relied on the contractor’s technical expertise.
- During development of the Clearinghouse database, DCRA did not furnish data necessary for OTA and DHCD to meet legislative requirements.
- The final iteration of the Clearinghouse is expected to contain most required functional elements but housing providers will have to input property and tenant information for the database to reach full functionality.

## What ODCA Recommends

- At the start of an IT project, OCP should discuss and document in the contract file a shared understanding of the procurement process and award type to be pursued with the implementing agency.
- OCP should establish a transition protocol for when there is a change in Contracting Officers following the award of a contract.
- The D.C. Council should require OCTO to conduct an information technology (IT) “impact assessment” as a provision in any legislation that mandates development and/or implementation of a new District IT capability such as the Rent Control Clearinghouse database.
- OCTO should review Mayor’s Order 2017-115 for revisions and updates and based on the review, then collaborate with the EOM to issue a new, updated version of the Mayor’s Order, or, if changes are not deemed necessary, notify all stakeholders identified in it that the Order remains in effect.
- DHCD should determine if its existing staff is sufficient to address short-term demands associated with the public launch of the Rent Registry, and the long-term needs related to operating and maintaining the database within the context of DHCD’s Rental Accommodations Division’s (RAD) other programmatic responsibilities.

# Background

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On June 2, 2025, the District of Columbia launched a Rent Control Clearinghouse Database (the District of Columbia Rent Registry). In approving legislation in 2015 the D.C. Council originally expected the implementation to be complete in a year's time. Instead, the project has taken a decade, and its development has involved a contractor, five key District agencies, and more than \$2 million in District funds.

The Rental Housing Act of 1985 enacted rent control<sup>1</sup> in the District in order to “protect low and moderate income tenants from the erosion of their income from increased housing costs, protect the existing supply of rental housing, and prevent the erosion of moderately priced rental housing while providing housing providers and developers with a reasonable rate of return on their investments.”<sup>2</sup> Rent control applies to multi-family units across the District unless they meet one of these four key exemptions defined generally as any unit that is:

- Federally or District-subsidized.
- In any building with a building permit issued after 1975.
- In any housing accommodation of four or fewer units.
- Continuously vacant and vacant when the Act took effect.<sup>3</sup>

For non-exempt units, rent increases must meet conditions that include:

- The unit is in substantial compliance with the housing regulations.
- The housing provider is properly licensed.
- Proper notice of the rent increase has been provided.
- The new rent charged cannot be more than the prior rent plus an allowable increase.
- Rent increases cannot occur more than once every 12 months.
- The housing unit must be registered with the Rental Accommodations Division (RAD) of the Department of Housing and Community Development (DHCD).<sup>4</sup>
- Rent increases are not effective until the first day on which rent is normally paid and more than 60 calendar days after the notice of increase is given to the tenant.<sup>5</sup>

Annual rent increases are based on the Consumer Price Index (CPI-W). These increases are intended to be the CPI-W percentage plus 2% and may not go higher than 10%.<sup>6</sup> There are other circumstances that permit an increase larger than this “automatic” amount, including capital improvements and rehabilitation.<sup>7</sup>

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1 D.C. Code and regulations often refer to rent control as rent stabilization.

2 The “Rental Housing Act of 1985,” D.C. Law 6-10, effective July 17, 1985. Codified at DC Code 42-3501.01 et seq.

3 D.C. Code § 42-3502.05.

4 D.C. Code § 42-3502.08.

5 D.C. Code § 42-3509.04.

6 D.C. Code § 42-3502.06.

7 See *generally* D.C. Code § 42-3502.08(h).

The program is administered by RAD. While there is no definitive count on the number of rent-controlled properties in the District—an issue that the database aims to address—a 2011 study by the Urban Institute used Computer Assisted Mass Appraisal Database research and D.C. tax data to estimate that there were 79,145 units and 4,818 rent-controlled properties in the District.<sup>8</sup>

Despite the goals of the program, tenant groups and community organizations have raised issues with the rent control system. Housing providers in the District have been alleged to have taken previously rent-controlled units offline by not reporting rent increases to DHCD or alerting new tenants about the unit’s protections. Further, many tenants remain unaware of their rights in rent-controlled units. The petition system to file a challenge for an unlawful rent increase was paper-based and allegedly often not explained to the renter. If a tenant in a rent-controlled unit is not aware that an increase is illegal and does not file a petition within three years,<sup>9</sup> that new price is set for the unit and affordability is permanently lost.<sup>10</sup>

Other complaints include difficulty finding rent-controlled units, lack of document accessibility, and limited information on what constitutes a “proper” rent increase. DHCD staff acknowledge that their previous system for compiling rental information was labor intensive and difficult to track.

In 2015, to respond to these issues and to create “a user-friendly, Internet-accessible, and searchable database for the submission, management, and review of all documents and relevant data... within DC’s rent control system,”<sup>11</sup> the Council introduced the Rent Control Housing Clearinghouse Amendment Act of 2015.<sup>12</sup> A version of the legislation was enacted in the Fiscal Year 2016 Budget Support Act of 2015.<sup>13</sup>

The legislation required the database to be completed in phases according to a specified timeline. Notably, the legislation required that within one year of the effective date the Clearinghouse would be available for housing providers to upload documentation and for tenants to search for units. It was to include:

- Building addresses and wards.
- Name, number, email of the owners and property managers.
- Owners’ basic business license information.
- Buildings’ Certificate of Occupancy date and number.
- Current vacancy status of each unit.
- Permissible annual rent increases.
- Six years of previous rent data for each unit.

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8 The Urban Institute, “A Rent Control Report for the District of Columbia,” June 2011. See: [A Rent Control Report for the District of Columbia | Urban Institute](#). p. 4.

9 D.C. Code § 42-3502.06.

10 S. Amanuel, “How Some Landlords Skirt D.C.’s Rent Control Law,” Washington City Paper, November 22, 2023. See: [How Some Landlords Skirt D.C.’s Rent Control Law - Washington City Paper](#).

11 DC Code § 42-3504.03c.

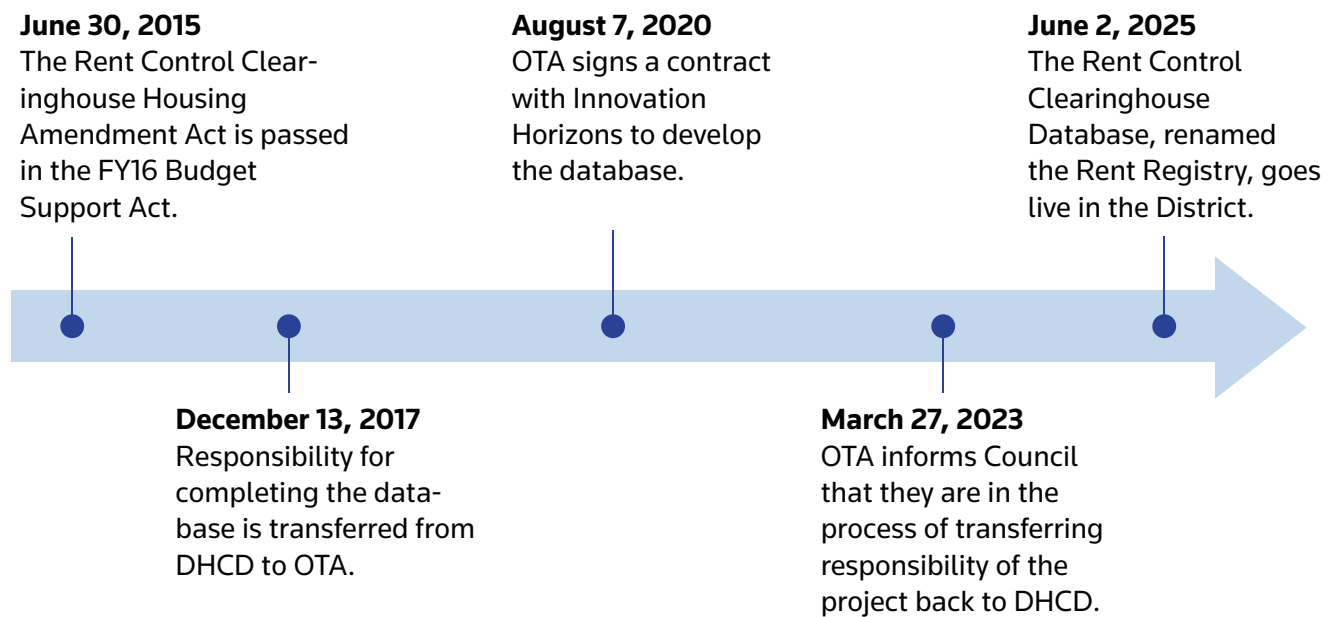
12 B21-119, introduced on March 3, 2015.

13 See Title II, Subtitle V, D.C. Law 21-36, effective October 22, 2015. This subtitle is also called the “Rent Control Housing Clearinghouse Amendment Act of 2015.”

This data was to have come from housing providers, DHCD, OCTO, and DCRA—now the Department of Buildings (DOB) and the Department of Licensing and Consumer Protection (DLCP).<sup>14</sup>

The initial legislation required DHCD to develop the database, but responsibility moved to OTA in 2017 and moved back to DHCD in 2023.

**Figure 1: Rent Control Clearinghouse Database Development Timeline**



Source: ODCA Analysis

14 “The Department of Buildings (DOB) and the Department of Licensing and Consumer Protection (DLCP), will serve residents, businesses, and visitors of the District of Columbia, taking on responsibilities previously under the Department of Consumer and Regulatory Affairs’ (DCRA) purview. This transition will allow each agency to enhance their consumers’ experiences through promoting their health, safety, and quality of life.” See: [The District’s Newest Agencies](#).

# Objectives, Scope, and Methodology

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## Objectives

The objectives of this audit were to:

1. Determine the extent to which the District has implemented the Rent Control Housing Clearinghouse Amendment Act of 2015 and subsequent related legislation.
2. To compare the anticipated features and functionality of the District’s Rent Control Clearinghouse to rent control registries/databases implemented in similar jurisdictions.

## Scope

The audit scope was October 1, 2015, through September 30, 2024 (Fiscal Years 2016 through 2024).

## Methodology

To address our objectives, we:

- Reviewed Rent Control Clearinghouse legislation and each amendment made from FY 2016 to FY 2024.
- Reviewed the District’s contract with the Rent Control Clearinghouse IT vendor.
- Interviewed key stakeholders at the involved District agencies including DHCD, OTA, DOB, OCTO, as well as contractor staff.
- Reviewed status reports submitted by DHCD, OTA, and the contractor to the Council of the District of Columbia (the Council).
- Accessed user guides and manuals for tenants, housing providers, and Rental Accommodations Division staff.
- Attended a live demonstration of the Clearinghouse presented by DHCD for housing providers and non-profits.
- Reviewed project expenditure information contained in the District’s financial systems (SOAR and DIFS) including FY 2023-FY 2024 payments in DIFS and FY 2020-FY 2022 payments in SOAR.<sup>15</sup>
- Reviewed invoices sent by the contractor to DHCD and OTA from FY 2020 to FY 2024.
- Analyzed task completion documentation for items outlined in the contract.
- Researched three jurisdictions with similar rent stabilization databases—Los Angeles, Montgomery County, Md., and San Francisco—and reviewed their user guides.
- Interviewed stakeholders in the three additional jurisdictions about the relative strengths of their databases.

The auditors conducted the engagement in accordance with GAGAS, except for GAGAS standard 8.27. This requirement states that “Auditors should inquire of management of the audited entity whether any investigations or legal proceedings significant to the audit objectives have been initiated or are in process with respect to the period under audit, and should evaluate the effect of initiated or in process investigations or legal proceedings on the current audit.”

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<sup>15</sup> The District transitioned from SOAR to DIFS October 1, 2022.

# Audit Results

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Since its inception, the Rent Control Clearinghouse project has faced numerous obstacles preventing it from going live. The DHCD team charged with developing the database initially did not meet the procurement deadlines outlined in the legislation. This prompted Council to transfer the project to OTA, which worked with OCP to complete the task of awarding a contract to an IT vendor. Once the contract was signed, the agencies then lacked necessary IT support and struggled to facilitate interagency data sharing. These challenges are detailed in the findings below.

While the audit scope ends on September 30 of 2024, it is important to note that the Clearinghouse database did not go live in the District until June 2, 2025. The user guides for this version of the database were produced during the audit scope and were used to analyze compliance with the contract and legislation. Despite the project's development phase now being complete, we hope that our analysis of the causes of the delays and the associated recommendations, if implemented, will improve District agencies' capabilities to complete future procurements and cross cuttings, large-scale IT projects that require multiple District entities to share data and subject matter expertise.

## **First DHCD then OTA did not meet statutory procurement deadlines necessary to begin development of the Clearinghouse database.**

D.C. Code required DHCD to award a contract to build the database within six months of the October 22, 2015, effective date of the Rent Control Housing Clearinghouse Amendment Act of 2015 (included in the FY 2016 Budget Support Act).

DHCD did not award a contract to build a database within the six months timeframe. In fact, DHCD made no substantive progress on the Clearinghouse in more than two years, which prompted Council to transfer the project to OTA in December 2017 via an amendment to the Rental Housing Act of 1985. While the original legislation established a set of project development phases with associated milestones, the new legislation removed the "phase" language and only required that a demonstration project "be completed within two years of December 13, 2017."<sup>16</sup>

Despite the two-year project timeline, it took OCP and OTA another two and a half years following the transfer to execute a contract with an IT vendor.

DHCD did not receive funding designated for developing the database. Per DHCD's 2016<sup>17</sup> and 2017<sup>18</sup> Performance Oversight testimony and FY 2016<sup>19</sup> budget actuals reported in those years' budgets, the agency did not spend money on the project and instead researched OCTO's ability to develop the database internally.

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<sup>16</sup> See Title II, Subtitle J of the "Fiscal Year 2018 Budget Support Act of 2017", Law 22-33, effective December 13, 2017.

<sup>17</sup> DHCD, "FY16 Performance Oversight Hearing," See: [https://dccouncil.gov/wp-content/uploads/2018/budget\\_responses/DHCD-POHFY16FINAL224.16.pdf](https://dccouncil.gov/wp-content/uploads/2018/budget_responses/DHCD-POHFY16FINAL224.16.pdf), p. 10

<sup>18</sup> DHCD, "FY17 Performance Oversight Hearing," See: <https://dccouncil.gov/wp-content/uploads/2017/05/dhcd.pdf>, p. 13.

<sup>19</sup> DHCD FY2016 Budget, June 22, 2016. See: [2016\\_Budget\\_V3.pdf](#)

Even before the official transfer in December 2017, OTA had begun to discuss the process of identifying a qualified vendor who could help develop the Clearinghouse. The agency first discussed the RCC project with OCP on July 21, 2017, which led to prolonged discussions about the best way to select a vendor for the project among OTA, DCRA, and the Council. OTA first sought to expedite the development of the Clearinghouse by pursuing a sole source contract award. However, after consulting with Council, OTA concluded it could no longer consider a sole source contract award.

OTA then explored the feasibility of collaborating with DCRA and a vendor with which DCRA had an existing contract, which seemed advantageous due to the vendor's knowledge of DCRA's data and operations. After negotiations, however, this possibility also fell through due to, according to OTA documentation, "reasons beyond OTA's control."<sup>20</sup>

Despite these attempts to find a faster contracting process the parties ultimately determined that a vendor would have to be selected through the competitive sealed proposal process. OTA and OCP initiated this in June 2018.

OTA sent a statement of work (SOW) to OCP for initial review on June 5, 2018. Between June 2018 and April 2019, OCP prepared the request for proposals (RFP), which was eventually published on April 5, 2019. Through amendments to the solicitation, OCP extended the due date for proposals four times in anticipation of a change in the legislative deadline for completing the RCC project. An OCP amendment to the RFP eventually established September 13, 2019, as the deadline for vendors to submit proposals.

Subject matter experts, including leadership from DHCD and OTA, formed a Technical Evaluation Panel (TEP) to review vendors' proposals and first met in late October 2019. The panel reviewed and evaluated six technical proposals and submitted their consensus recommendation to the OCP contracting officer (CO) in January 2020. The CO awarded the contract seven months later on August 7, 2020.

Between August 2018 and March 2019 OCP assigned three different contract specialists to the project. Note that the Contract Specialist and Contracting Officers (COs) are assigned by OCP to work with Contract Administrators (CAs) from the agency. It is the role of the CO to provide oversight and support for the agency's CA managing the contract. OTA reported waiting weeks for draft RFP documentation to be reviewed. GAO best practices find that a key to a successful IT acquisition is "government and contractor staff [that are] consistent and stable."<sup>21</sup>

Lack of consistency in contracting personnel extended throughout the project. There were multiple changes in COs following the award of the contract with little formal communication provided to the vendor each time. From one interviewee's perspective, "each time [there was a change in CO] we had to re-brief OCP on everything, starting from scratch."<sup>22</sup>

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20 OTA Communication to Council, "Overview of OTA Interactions with the Office of Contracting and Procurement."

21 D. Powner, "Leveraging Best Practices to Help Ensure Successful Major Acquisitions," GAO, November 13, 2013. See: [Information Technology: Leveraging Best Practices to Help Ensure Successful Major Acquisitions | U.S. GAO](#), p. 2.

22 ODCA conducted interview.

High turnover in procurement personnel and resulting inefficiencies create reputational risk for District government. False starts in the contracting process and unsuccessful negotiations, as well as long delays in the competitive proposal process, may make it less likely that qualified vendors with relevant subject matter expertise will engage with District projects. Agency staff reported that at least two vendors with either rent control or District housing market expertise were unable to move forward in the procurement process due to challenges in establishing the contract type.

## Recommendations

1. At the start of an IT project, OCP should discuss and document in the contract file a shared understanding of the procurement process and award type to be pursued with the implementing agency.
2. OCP should establish timelines in their policies and procedures for the development and evaluation of the Scope of Work and Request for Proposals that include regular, periodic check-ins with the implementing agency.
3. OCP should establish a transition protocol for when there is a change in Contracting Officers following the award of a contract.

### **OCP's Contracting Officer exercised his discretion to select a contractor who was not recommended by the Technical Evaluation panel and did not have previous housing experience, did not produce an independent assessment supporting the selection, and did not confer with the Technical Evaluation panel prior to the award.**

The 2018 update of OCP's Procurement Procedures Manual establishes requirements for a Contracting Officer's evaluation of proposals to include the input of an evaluation panel<sup>23</sup>:

"The contracting officer must conduct an independent assessment of the proposals and cannot simply adopt the findings of the evaluation panel. Elements of a sound independent assessment include:

- An independent review of technical proposals.
- Conversations with the technical panel's chairperson regarding the panel's initial evaluation and findings.
- Reviewing the panel's final evaluation report.
- Comparing the final evaluation report against the contracting officer's own review of the technical proposals."

OCP's Procurement Procedures Manual further states, "the contracting officer must provide contemporaneous documents of the independent assessment."

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<sup>23</sup> OCP, "Procurement Procedures Manual." See: [https://dcdgovict.sharepoint.com/:b:/r/sites/PPL/PPL/Contracting%20and%20Procurement/Policies%20and%20Procedures/Procurement%20Procedures%20Manual%20\(2018%20update\).pdf?csf=1&web=1&e=jv88JJ](https://dcdgovict.sharepoint.com/:b:/r/sites/PPL/PPL/Contracting%20and%20Procurement/Policies%20and%20Procedures/Procurement%20Procedures%20Manual%20(2018%20update).pdf?csf=1&web=1&e=jv88JJ), p. 33.

OCP was unable to provide the contracting officer's independent assessment of the proposals. Further, the chair of the TEP said they never received an explanation from the CO about the CO's decision to select a vendor that was not recommended.

OCP formed a Technical Evaluation Panel (TEP) comprised of subject matter experts from OTA and DHCD to evaluate vendors' technical proposals. Rather than selecting the vendor the TEP had recommended as being best qualified, the CO awarded the contract to another vendor whose proposal the TEP had also reviewed. While a CO has the authority to award the contract to their choice of vendor, OCP did not maintain documentation of the TEP's recommendation or the CO's independent review of technical proposals. He also did not hold conversations with the technical panel's chairperson regarding the panel's initial evaluations and findings or document a comparison of the TEP's report against his own review of the technical proposals.

As a result, OCP's policies and procedures for awarding a contract following a Technical Evaluation were insufficiently enforced. The audit team found no indication that any OCP staff or TEP members had seen an independent assessment explaining the CO's vendor selection. This may be due in part to the turnover of OCP staff highlighted in the previous finding.

Without the required discussion between the CO and the TEP prior to a decision, important information may not have been considered. It is important to note that both OTA and DHCD personnel spoke highly of the selected vendor's work and professionalism during the contract performance period. However, interviewees also cited a steep learning curve that the District needed to manage, which likely would not have existed had a vendor with housing market experience received the contract award. Note that previous housing market experience was a key factor in the TEP's recommendation.

The OCP Procurement and Procedures Manual did not require the CO to discuss their decision with the TEP after the fact or to inform the agency that would be responsible for administering the awarded contract.

The lack of transparency in this process created mistrust toward OCP. DHCD and OTA subject matter experts volunteered for this panel and felt disrespected by the lack of explanation following the vendor selection. While the CO has the discretion to make an award against the recommendation of the TEP, the CO did not communicate with the members of the TEP as to why they did so. When questioned about their decision not to award the contract in line with the TEP's evaluation, the CO indicated that the agencies were attempting to improperly influence the award process.

More generally, documentation for key decisions in the contracting process was particularly crucial given the turnover of OCP staff assigned to this project. Future contracting staff may need to reference documentation such as the CO's independent assessment. Failure to complete required documentation of the competitive bid process, in particular a CO's decision to award a contract against a TEP's recommendation, could expose the District to liability if one of the unsuccessful bidders challenged the award through an appeal process.<sup>24</sup>

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<sup>24</sup> "The Contract Appeals Board provides an impartial, expeditious, inexpensive, and knowledgeable forum for hearing and resolving contractual disputes and protests involving the District and its contracting communities. The Procurement Practices Act vests the Board with exclusive jurisdiction to decide: protests of District contract solicitations and awards, [and appeals by contractors of District contracting officer final decisions...]" <https://cab.dc.gov/page/about-cab>

## Recommendations

4. OCP should update policies and procedures to ensure a CO's independent assessments are completed and included in the contract file.
5. OCP should update policies and procedures to require COs to notify in writing and provide a rationale to the members of the Technical Evaluation Panel prior to award of the contract when their recommendation is not accepted.

### **OTA's and DHCD's Contract Administrators lacked previous IT project management expertise, were not afforded regular guidance and support from OCTO subject matter experts and often relied on the contractor's technical expertise.**

OCTO's IT Procurement and IT Project Policy states,<sup>25</sup>:

"OCTO is responsible for defining the approval procedure, setting the approval standards, coordinating the approval process, and responding to Agency requests and inquiries related to approval actions and related requisitions."

In addition, OCTO's role is more specifically defined in the contract between OTA and the selected vendor, Innovation Horizons. The contract states,<sup>26</sup>: "OCTO will serve in a consulting capacity and will collaborate with OTA and Contractor in the curation of data as well as the design and development process." This role is important as the contract deliverables included data management and integration plans, software test scripts, and system hardware information.

GAO best practices for IT acquisitions also speak to the importance of "active engagement among project stakeholders" and a team-based approach that promotes the sharing of technical competence. In a report on procurement best practices, GAO found<sup>27</sup>:

Stakeholders, among other things, reviewed contractor proposals during the procurement process, regularly attended program management office sponsored meetings, [and] were working members of integrated project teams... [K]nowledge and skills of the program staff were critical to the success of the program. This included knowledge of acquisitions and procurement processes, monitoring of contracts, large-scale organizational transformation, Agile software development concepts,<sup>28</sup> and areas of program management such as... technical monitoring.

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25 OCTO, "IT Procurement and IT Project Policy," February 22, 2021. See: [IT Procurement and IT Project Policy | octo](#)

26 CW80322: Rent Control Clearinghouse Database. See: <https://contracts.ocp.dc.gov/contracts/details?id=Q1c4MDMyMsKmQmFzZS-BQZXJpb2Q%3D&hash=3ghke12bkky841jn>

27 D. Powner, "Leveraging Best Practices to Help Ensure Successful Major Acquisitions," GAO, November 13, 2013. See: [Information Technology: Leveraging Best Practices to Help Ensure Successful Major Acquisitions | U.S. GAO](#), p. 13.

28 "Agile software development is not a set of tools or a single methodology, but a philosophy based on selected values, such as prioritizing customer satisfaction through early and continuous delivery of valuable software; delivering working software frequently, from every couple of weeks to every couple of months; and making working software the primary measure of progress. For more information on Agile software development, see <http://www.agilealliance.org>." See: [Information Technology: Leveraging Best Practices to Help Ensure Successful Major Acquisitions | U.S. GAO](#).

In the initial stages of identifying a potential IT contractor, OTA submitted a statement of work (SOW) for the project to OCTO. According to OTA staff OCTO was definitely involved early on as OCTO and OCP collaborated on the statement of work. In July 2018 OCTO approved the SOW. After approval of the SOW, OCTO was rarely involved in the project. OTA and DHCD contract administrators rarely engaged OCTO to assist in the design and development process.

OCTO did not establish approval processes for the review of technical deliverables such as test scripts or data integration plans. Instead, OTA's and DCHD's Contract Administrators were responsible for participating in design meetings with the IT vendor as well as reviewing and approving technical deliverables despite having no training or prior experience with developing a large-scale IT project. The vendor reported occasions in which they struggled to get a sign off on certain technical deliverables. When DHCD brought in a more technically proficient team member to evaluate deliverables they noticed that there was "no methodology"<sup>29</sup> for assessing risk of technical compliance once a deliverable was received.

The process for formally engaging OCTO on a complex project like the development of the Clearinghouse is not adequately defined. OCTO's IT Procurement and IT Project Policy, while it defines what OCTO is required to do, does not explain how an implementing agency such as OTA or DHCD should engage OCTO. The Policy states,<sup>30</sup> "The interpretation and implementation of this policy have been assigned to the Chief Technology Officer (OCTO) Program Management Office (PMO), which will publish further procedures and guidelines as required." The audit team was unable to identify any additional procedures or guidelines that would be relevant to this or other similar projects.

The audit team was unable to determine why OCTO was not asked to play a more active role on the Clearinghouse project. OCTO was consulted sporadically throughout the project when issues arose including, for example, when District agencies disagreed over data sharing. Even then, agency staff reported that they were unsure who their primary contact at OCTO should have been and when they were to be involved. A senior OCTO manager told us that often their agency is called in to advise on a project only after something "blows up."<sup>31</sup>

More generally, the Rent Control Clearinghouse legislation passed by Council lacked explicit direction on the IT development process and potential OCTO involvement. OCTO management stated their typical role is that of a consultant not a partner, meaning that prescriptive legislation has not been their typical operating environment.

Lacking specific and consistent OCTO guidance and input, the agency contract administrators were largely reliant on their own knowledge and experience and on the vendor. While in this instance the vendor has been lauded for its competence and professionalism, over-reliance on an IT contractor could pose a risk and weaken the District's ability to detect and prevent fraud, waste, and non-compliance with technical specifications.

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29 ODCA conducted interview.

30 OCTO, "IT Procurement and IT Project Policy," February 22, 2021. See: [IT Procurement and IT Project Policy | octo](#)

31 ODCA conducted interview.

The lack of IT oversight did contribute to delays and to OCP issuing a stop work order to the IT vendor. When the Clearinghouse project was transferred back to DHCD at the end of 2022 the language in legislation mandating the transfer stated that a “completed, tested, and operational” database would be transferred to DHCD for “administration and management.”<sup>32</sup> However, due to delays in receiving required data and other project delays, OTA transferred the Clearinghouse database back to DHCD before it was fully functional. Subsequently, the new contract administrator at DHCD, along with a DHCD IT expert, reviewed the adequacy of contract deliverables previously approved by OTA’s contract administrator. This ultimately prompted a new Contracting Officer at OCP to request a revised project plan and deliverables. When they were not immediately provided by the vendor, a Stop-Work order was placed on the contract causing a three-month delay.

A renewed effort to define and publicize OCTO’s policies for involvement on IT projects would allow the agency to enumerate project priorities and concerns that implementing agencies should address and would greatly increase the likelihood that OCTO plays a consistent, ongoing role throughout the IT project’s lifecycle.

## Recommendations

6. The D.C. Council should require OCTO to conduct an information technology (IT) “impact assessment” as a provision in any legislation that mandates development and/or implementation of a new District IT capability such as the Rent Control Clearinghouse database.
7. OCTO should issue new guidance to all District agencies that: (a) reiterates and explains its authority to regulate the acquisition of IT systems throughout District government and (b) explains how and when District agencies’ IT Project Managers should engage OCTO and ensure their projects receive the reviews required under the Policy.

## **During development of the Clearinghouse database, DCRA did not furnish data necessary for OTA and DHCD to meet legislative requirements.**

Mayor’s Order 2017-115, “District of Columbia Data Policy,” states<sup>33</sup>:

The greatest value from the District’s investment in data can only be realized when enterprise datasets are freely shared among District agencies...

Dataset classification levels are defined as the following: ... Level 0, Open, refers to all enterprise datasets that do not fall within the definitions of level 1, 2, 3, or 4. For example, certificates of occupancy are determinations by the Department of Consumer and Regulatory Affairs (DCRA) that the use of a building, structure, or land in the District conforms to zoning regulations and building codes. This dataset would not be designated by DCRA as Level 1, 2, 3, or 4 and therefore would be considered Level 0.

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<sup>32</sup> DC Code § 42-3502.03c.

<sup>33</sup> Mayor’s Order 2017-115, “District of Columbia Data Policy,” April 27, 2017. See: [2017-115\\_District-of-Columbia-Data-Policy.pdf](#)

Streamlined Processes for Interagency Data Sharing - To lower the cost and increase the speed of the intra-District sharing of datasets classified as Level 2 or Level 1, the Chief Technology Officer, in coordination with the Office of the City Administrator, shall develop uniform data-sharing agreements. A public body shall not require another public body to enter into a data-sharing agreement other than the uniform data-sharing agreement in order to have access to view, utilize, or transfer Level 1 or Level 2, datasets, unless a different data-sharing agreement is approved by the City Administrator.

D.C. Code requires that the publicly accessible rent control portal will include several search parameters and additionally any “information the OTA determines is relevant to tenants seeking and living in rent control accommodations.”<sup>34</sup> The additional information would supplement the required data including properties’ Basic Business Licenses, ownership information, and housing code violations.

DCRA, which has subsequently been split into the Department of Buildings (DOB) and the Department of Licensing and Consumer Protection (DLCP)<sup>35</sup> was identified in the District’s August 2020 contract with Innovation Horizons as “the agency responsible for the enforcement of the housing code, building code and business licensing requirements. In that capacity, DCRA issues BBL and C of O [certificates of occupancy], performs housing inspections, and issues notices of code violations to housing providers.”<sup>36</sup>

DCRA (now DOB/DLCP) would not share property data needed for the database with OTA or DCHD without a data sharing agreement, which ultimately took more than four years to execute. Once the contract with Innovation Horizons was signed, OTA began working to identify and gain access to the various data sets necessary to complete the database. According to OTA, after conducting an initial assessment, it was determined that a large portion of the data necessary to develop and operate the database was stored at DCRA.

In a status report to Council,<sup>37</sup> OTA summarized the initial, protracted negotiations as follows:

In order to obtain that data for use in the Database, OTA (in collaboration with [DHCD] and the Vendor) had numerous discussions with DCRA, beginning in December 2020. For several months those discussions did not result in DCRA consenting to share the data at issue. In July 2021, DCRA finally agreed that starting August 2021 it would provide the data via a [daily transfer.] No data was provided in August. In September, DCRA informed OTA that the previously agreed upon data transfers would not be forthcoming. Instead, DCRA made a one-time data transfer and notified OTA that in order to provide further access to DCRA data, an MOU would be necessary....

OTA’s General Counsel has reached out to the General Counsels at DCRA and DHCD. Since October 8 [2021], they have been meeting weekly to finalize an MOU between the three agencies. The

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34 D.C. Code § 42-3502.03c(1).

35 The “Department of Buildings Establishment Act of 2020”, Law 23-269, effective April 5, 2021. became applicable upon the date of inclusion in an approved budget and financial plan, which occurred via section 7207 of the “Fiscal Year 2022 Budget Support Emergency Act of 2021) which became effective on October 1, 2021.

36 CW80322: Rent Control Clearinghouse Database. See: <https://contracts.ocp.dc.gov/contracts/details?id=Q1c4MDMyMsKmQmFzZS-BQZXJpb2Q%3D&hash=3ghke12bkky841jn>

37 Quarterly reports to Council regarding the progress of the database are required pursuant to D.C. Code § 42-3502.03c(g).

General Counsels are preparing to meet with technical staff and are committed to completion of the MOU as close to October 31 [2021] as possible.<sup>38</sup>

In subsequent status reports to the Council, OTA noted the challenges it continued to face with obtaining data from DCRA. In December 2021, OTA reported the following: “[E]ven if an MOU were executed immediately, it would not be possible to complete the development and testing of the database by March 31, 2022. The OTA therefore regrets to report that a further delay has become inevitable. At this point, we are unable to estimate the length of the delay as we do not know how long negotiations with DCRA will last.” In March 2023, OTA reported to the Council that, “DCRA has refused to share with OTA and RAD certain data collected and maintained by DCRA. As a result, the development of the Database was delayed and did not include the integration of all necessary data.”<sup>39</sup>

In June 2024, over two years after DCRA split into DOB and DLCP, DHCD and DOB signed an MOU “to facilitate the transfer of data...from DOB to DHCD to enable DHCD to verify the housing provider-provided data in its Database.”

DHCD and OTA’s authority to obtain and use data was not defined clearly enough in the rent control clearinghouse legislation and was limited to a simple requirement to provide “any information...determined relevant.”<sup>40</sup> This was heavily contested by DCRA during the protracted negotiations. DCRA cited privacy concerns as a reason for not transferring data to OTA. Stakeholders shared concerns that the data either did not exist or was poorly tracked.

Employees at OTA and DHCD described DCRA as “an obstacle” rather than a partner, or “sister agency,” with a shared goal.<sup>41</sup> This resulted in significant project delays as well as compromises to Clearinghouse database capabilities. For example, rather than enabling live data transfers to DHCD, DOB transmits data each morning through a manual process. In addition to the increased resources this process requires, it also makes the transfer more vulnerable to human error.

## Recommendation

8. OCTO should review Mayor’s Order 2017-115 for revisions and updates and based on the review, collaborate with EOM to issue a new, updated version of the Mayor’s Order, or, if changes are not deemed necessary, notify all stakeholders identified in it that the Order remains in effect.

**The final iteration of the Clearinghouse contains most required functional elements, but housing providers will have to input property and tenant information for the database to reach full capability.**

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38 OTA Status Report to Council, October 21, 2021.

39 OTA Status Report to Council, December 28, 2021.

40 DC Code § 42-3502.03.

41 ODCA conducted interview.

D.C. Code requires real-time, searchable parameters including:<sup>42</sup>

- Building address and ward.
- Name, number, email of the owner and property manager.
- Owner's basic business license.
- Building's Certificate of Occupancy date and number.
- Current vacancy status of each unit.
- Permissible annual rent increases.<sup>43</sup>

The original 2015 legislation aimed to develop this functionality within two years, to include "the integration of existing data contained in documents previously submitted to the RAD, into the database." The current D.C. Code requires the database to be "completed, tested, and operational by September 30, 2020."

The Innovation Horizons contract makes clear that the final product should create two portals—a public portal for tenants and a private portal that would be divided among housing providers and the RAD support staff.

DHCD, OTA, and the Innovation Horizons teams have successfully built the required portals for tenants, housing providers, and the RAD team. The primary capabilities of the Rent Control Clearinghouse have remained consistent through each iteration of legislation.<sup>44</sup>

However, the Rent Control Clearinghouse Database did not contain a significant amount of data mandated by the legislation on the go live date. While DHCD and OTA were able to gain access to business licenses, certificates of occupancy, and housing violations through an MOU with DOB, they will rely on housing providers to upload substantial amounts of tenant, unit, and property information. The database will not include historic rent data nor will previous rents or rent petitions be incorporated into the Clearinghouse database as the data is inaccessible.

DHCD's system of record, FileNet, which contains a significant amount of historical rent and rent petition information, could not be converted, meaning most of the historical data was unusable. Housing providers have tenant information, and DHCD has requested that providers submit the necessary data.

Due to the lack of information currently in the Clearinghouse, considerable work remains to get the Clearinghouse database to function as mandated. This includes training, periodic collection of new data, and ongoing technical support. RAD currently has a staff of 10 working on all rental projects in the District including registering rental units, processing claims of exemption from rent control and overseeing rent increases for both rent stabilized and non-rent stabilized units. This staff will be under a lot of pressure in the 90-day period for the initial registration of properties.

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42 DC Code § 42-3502.03c.

43 Subsequent legislation removed the requirement for previous rent data. First appearing DC Code 42-3502.03c effective December 13, 2017.

44 ODCA did not review the live version of the Rent Registry rather attended a preview demonstration and used the user guides produced during the audit scope.

Multiple interviewees questioned whether existing staffing will be able to manage the large amount of incoming data while providing customer service to District stakeholders. These challenges will be exacerbated when the District’s current contract with Innovation Horizons expires later this year.

## Recommendation

- DHCD should conduct an analysis to determine whether its existing staff is sufficient to address short-term demands associated with the public launch of the Rent Registry, and the long-term, ongoing needs related to operating and maintaining the database within the context of RAD’s other programmatic responsibilities.

## Jurisdictional comparison

Over the past decade, jurisdictions with large rental housing portfolios and rent stabilization legislation have invested in online rent registries. Using the information available in user guides, demonstrations, and stakeholder interviews, ODCA researched and compared these rent registries with D.C.’s Rent Control Clearinghouse database (DC’s Rent Registry). This assessment includes providing basic information for each jurisdiction and comparing the database’s anticipated data and features. The comparison helps explain the utility the registry has and can have for the District and its residents.<sup>45</sup>

Figure 2 highlights key features and implementation practices from four jurisdictions.

**Figure 2: Rent Registry Jurisdictional Comparison**

	District of Columbia	Montgomery County, Md.	San Francisco, Calif.	Los Angeles County, Calif.
<b>Name of Registry/Portal (Site)</b>	DHCD Rent Registry	DHCA Rental Housing Portal <sup>46</sup>	Rent Board Housing Inventory and Fee Portal	Consumer and Business Affairs Rent Registry
<b>Year Database Went Live</b>	2025	2024 <sup>47</sup>	2022	2021

<sup>45</sup> The authorities and roles of the offices responsible for maintaining the rental housing registries in other jurisdictions differ from those of the two entities responsible for developing the District’s Rent Registry: the Office of the Tenant Advocate and the Department of Housing and Community Development. This jurisdictional comparison does not address such roles and authorities, it is merely a comparison of the fundamental technical capabilities of several jurisdictions’ rent registries.

<sup>46</sup> “The Rental Housing Portal is a tool to help with compliance with a range of rental housing laws and regulations by providing a system that houses all licensed rentals, including rent-stabilized, exempt, single-family, multifamily, and condominium rental properties.” See: [rental-housing-portal](#).

<sup>47</sup> Montgomery County estimates having provider-entered data on all rental units within 2-3 years of launch.

	District of Columbia	Montgomery County, Md.	San Francisco, Calif.	Los Angeles County, Calif.
<b>Rent Registry User Guide</b>	Rent Registry Tenant User Guide <sup>48</sup>	Montgomery County User Manual <sup>49</sup>	San Francisco Public User Guide <sup>50</sup>	Los Angeles Rent Registry User Guide <sup>51</sup>
<b>Units that Require Registration?</b>	All Rental Units	All Rental Units	All Residential Properties <sup>52</sup>	All Rental Units <sup>53</sup>
<b>File Tenant Petitions Through Portal?</b>	Yes <sup>54</sup>	Yes	No	No
<b>Publicly Searchable Database?</b>	Yes	Yes	Yes	Yes
<b>Unit Feature Information Required to be Entered by Providers</b>	Bedrooms, Appliances, Internet, HVAC, Services <sup>55</sup>	None	Bedrooms, Bathrooms, Square Feet	Bedrooms
<b>Registration Frequency</b>	Once within 90 days of launch	At lease signing <sup>56</sup>	Annual	Annual
<b>Fee required from Providers to register units on database?</b>	No	No	Yes <sup>57</sup>	Yes
<b>Payments Accepted through Site</b>	No	No	Yes	Yes

48 DHCD, “Rent Control Clearinghouse Database, User Guide, Tenant Portal” September 2024. See: [User Guide Tenant Portal \(UAT 2024-11-14\).pdf](#).

49 Montgomery County DCHA, “Rental Housing Portal, Landlord User Manual.” See: [DHCA\\_Landlord\\_Portal\\_User\\_Manual-v3.pdf](#).

50 City of San Francisco, “Rent Board Portal User Guide.” See: <https://portal.sfrb.org/DXAdmin/ImageBrowser/ThumbnailImages?documentId=1136239>.

51 Los Angeles County Consumer and Business Affairs, “LA County Rent Registry User Guide,” 2024. See: [Landlord-Registration-Guide-8.13.24](#).

52 “If you own residential property, you are required to report into the Housing Inventory online through the Rent Board Portal. Property owners who have tenants will receive a rent increase license after the submission.... The purpose of reporting is to help San Francisco maintain an accurate inventory of San Francisco’s residential housing stock.” <https://www.sf.gov/rent-board-housing-inventory>.

53 Most rental units and single-family homes in the county are either “fully covered” or “partially covered” by rent restrictions and/or eviction proceedings and require registration.

54 Tenant petitions include: “changes to rent, services and facilities, notices to vacate, security deposits, and tenants organization.” They provide renters with increased resources and information. See: [User Guide Tenant Portal \(UAT 2024-11-14\).pdf](#), p.4.

55 e.g., doorman, security guards, community room, fitness room, swimming pool, rooftop deck.

56 “All landlords must register all rents and fees associated with new leases and lease renewals at the time of signing. This requirement applies to both rent-stabilized and exempt units.” <https://www.montgomerycountymd.gov/dhca/rental-housing-portal/rental-housing-portal.html>.

57 “All residential property owners must pay a per-unit Rent Board fee unless the unit(s) have a current exemption. This includes single-family homes and condominiums, units built after 1979, vacant units, and units occupied by friends or family members.” See: [The Rent Board Fee | SF.gov](#).

	District of Columbia	Montgomery County, Md.	San Francisco, Calif.	Los Angeles County, Calif.
<b>Attestation Required from Housing Provider?<sup>58</sup></b>	Yes	No	Yes	Yes

Source: ODCA Analysis

The Rent Control Clearinghouse database is designed to provide vital unit and property information to both tenants and RAD staff while easing the burden of compliance on housing providers. With regard to many key functions, the database aligns with best practices and other leading jurisdictions. The District’s database contains three portals: tenant, housing provider, and RAD staff. The tenant portal includes a publicly searchable database for individuals to learn more about units and become more informed tenants. In addition, the tenant portal allows current tenants to file petitions for improvements and flag potentially illegal rent increases. This resource, in addition to the required attestation by housing providers on all submitted documentation, allows for increased tenant protection and transparency.

Still, there are areas in which the current iteration of the database in the District falls short of comparable jurisdictions. These issues primarily concern operations and maintenance. Currently, there is no fee charged for D.C. housing providers’ inclusion in the database and no funds from unit registration fees are routed to Rent Registry maintenance.<sup>59</sup> Additionally, there is no ability to pay standard unit fees or fines. Finally, registration is only statutorily required once, not annually.

58 Through such an attestation, the provider is certifying, “under penalty of perjury,” that the information provided is true and correct. This is important as responsible agencies do not have the staff capabilities to review documentation to verify the lease/tenant information submitted.

59 DHCD staff has proposed legislation that would add an additional fee for Rent Registry maintenance as well as directing some of the rent registration fee towards the Registry.

# Conclusion

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The Rent Control Clearinghouse database is an important tool to educate tenants, streamline government processes, and protect the District’s affordable housing stock. In fact, the Clearinghouse database today is far more robust than initially required by legislation. It includes property information for all units in the District, not just those subject to rent stabilization. The database allows DHCD to administer their petition and rent tracking system online. These changes will help protect tenants rights and enable the District to provide more robust oversight of housing providers.

However, the 10-year development process highlights areas of District government ineffectiveness. Turnover in procurement personnel, only limited coordination among partner agencies, and unclear contracting guidelines caused years of delays in finding a vendor. A lack of technological support from OCTO hampered the contract administrators’ ability to promptly review deliverables and created an overreliance on the contractor. Protracted data sharing negotiations with DCRA, despite a 2017 Mayor’s Order stating that a “public body shall not require another public body to enter into a data-sharing agreement,”<sup>60</sup> resulted in years of slowdowns and unnecessary, often unsuccessful compromises.

Agency management reminded us throughout the audit that these challenges were not entirely unexpected nor were they unique to this project. An OTA official noted that, “Council[members] are not technocrats.”<sup>61</sup> The database’s features included in the legislation were far more comprehensive than the policies and procedures to ensure they were effectively and efficiently implemented. Without proper support like IT impact statements, procurement policies, and data sharing principles, the very same challenges that plagued this project will likely be repeated for large IT contracts and projects across the District.

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60 Mayor’s Order 2017-115, “District of Columbia Data Policy,” April 27, 2017. See: [2017-115\\_District-of-Columbia-Data-Policy.pdf](#), p. 17.

61 ODCA conducted interview.

# Summary of Report Recommendations

Our audit identified nine recommendations that could improve operations at OCP, OCTO, and DHCD.

Findings	Recommendations
<p>First DHCD then OTA did not meet statutory procurement deadlines necessary to begin development of the Clearinghouse database.</p>	<ol style="list-style-type: none"> <li>1. At the start of an IT project, OCP should discuss and document in the contract file a shared understanding of the procurement process and award type to be pursued with the implementing agency.</li> <li>2. OCP should establish timelines in their policies and procedures for the development and evaluation of the Scope of Work and Request for Proposals that include regular, periodic check-ins with the implementing agency.</li> <li>3. OCP should establish a transition protocol for when there is a change in Contracting Officers following the award of a contract.</li> </ol>
<p>OCP’s Contracting Officer exercised his discretion to select a contractor who was not recommended by the Technical Evaluation panel and did not have previous housing experience, did not produce an independent assessment supporting the selection, and did not confer with the Technical Evaluation panel prior to the award.</p>	<ol style="list-style-type: none"> <li>4. OCP should update policies and procedures to ensure a CO’s independent assessments are completed and included in the contract file.</li> <li>5. OCP should update policies and procedures to require COs to notify in writing and provide a rationale to the members of the Technical Evaluation Panel prior to award of the contract when their recommendation is not accepted.</li> </ol>
<p>OTA’s and DHCD’s Contract Administrators lacked previous IT project management expertise, were not afforded regular guidance and support from OCTO subject matter experts and often relied on the contractor’s technical expertise.</p>	<ol style="list-style-type: none"> <li>6. The D.C. Council should require OCTO to conduct an information technology (IT) “impact assessment” as a provision in any legislation that mandates development and/or implementation of a new District IT capability such as the Rent Control Clearinghouse database.</li> <li>7. OCTO should issue new guidance to all District agencies that: (a) reiterates and explains its authority to regulate the acquisition of IT systems throughout District government and (b) explains how and when District agencies’ IT Project Managers should engage OCTO and ensure their projects receive the reviews required under the Policy.</li> </ol>
<p>During development of the Clearinghouse database, DCRA did not furnish data necessary for OTA and DHCD to meet legislative requirements.</p>	<ol style="list-style-type: none"> <li>8. OCTO should review Mayor’s Order 2017-115 for revisions and updates and based on the review, collaborate with EOM to issue a new, updated version of the Mayor’s Order, or, if changes are not deemed necessary, notify all stakeholders identified in it that the Order remains in effect.</li> </ol>

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The final iteration of the Clearinghouse contains most required functional elements, but housing providers will have to input property and tenant information for the database to reach full capability.

**9.** DHCD should conduct an analysis to determine whether its existing staff is sufficient to address short-term demands associated with the public launch of the Rent Registry, and the long-term, ongoing needs related to operating and maintaining the database within the context of RAD's other programmatic responsibilities.

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## Agency Comments

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On August 8, 2025, we sent a draft copy of this report to the Department of Housing and Community Development (DHCD), Office of the Tenant Advocate (OTA), and the Office of Contracting and Procurement (OCP) for review and written comment. The audit team also sent a copy of the report to the Office of the Chief Technology Officer given the report had recommendations for their agency. DHCD and OCP responded with comments on August 22, 2025. OTA responded with comments on August 29, 2025. OCTO responded with comments on September 4, 2025. Agency comments are included here in their entirety.



GOVERNMENT OF THE DISTRICT OF COLUMBIA  
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT



August 22, 2025

Kathleen Patterson  
District of Columbia Auditor  
Office of the District of Columbia Auditor  
1331 Pennsylvania Avenue, N.W.  
Suite 800 South  
Washington, D.C. 20004

Reference: Response to Draft Audit Report: *DC's New Rent Registry: A Decade of Delay*

Dear Ms. Patterson:

Thank you for the opportunity to respond to the draft audit report from the Office of the District of Columbia Auditor (ODCA) dated August 8, 2025. The Department of Housing and Community Development (DHCD) acknowledges and appreciates your office's attention and your prospective recommendations.

The RentRegistry<sup>1</sup> is a highly anticipated modernization project which DHCD released on June 2, 2025. The purpose of this Internet-based database is to administer the Rental Housing Act of 1985 (Act) (D.C. Official Code 2001 ed., as amended, § 42-3502.01 *et seq.*). Legislation creating the RentRegistry was enacted in 2015 and Council contemplated completion and delivery within one year, but there were unanticipated and significant impediments and complications throughout the course of the project's development.

We look forward to the potential of this new administrative tool and our continued collaboration with ODCA to address any issues once the database is fully populated with data and information. Over the course of the project, DHCD aided and consulted on the project's development. Notably, the legislation did not designate authority over the creation of the database to DHCD in the eight years prior to DHCD receiving the project incomplete in 2023, or after. Despite the absence of authority or an accompanying budget for the development and completion of the database, DHCD diligently worked to complete and deliver the RentRegistry within the two years of the transfer.

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<sup>1</sup> The Rent Control Housing Clearinghouse Amendment Act of 2015 (D.C. Law 21-0036) titled the rent control database as the Public Accessible Rent Control Housing Clearinghouse Database. During development, the database was renamed the RentRegistry.

DHCD Response to the Draft Audit Report

August 22, 2025

Page 2 of 5

The RentRegistry will be an instrumental tool offering insight, transparency and accountability in the District's rental housing market. DHCD remains committed to ensuring the RentRegistry's continued growth, functionality and accessibility while supporting the District's tenants, housing providers, and stakeholders. DHCD reviewed the draft report and provides responses to the Auditor's findings and recommendation for DHCD in an attachment to this letter.

We value ODCA's work and share the goal of ensuring the RentRegistry functions as a comprehensive, user-friendly, and sustainable system. DHCD is ready to maintain, operate and support the new database and will continue to partner and coordinate with sister agencies to achieve optimal outcomes for the District's citizens.

If you require further information, please do not hesitate to reach out.

Sincerely,



Colleen Green  
Director

Enclosure

cc: Betsy Cavendish, EOM  
Lauren J. Pair, Rent Administrator, DHCD/RAD

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**Attachment**  
**DHCD’s Responses to the Draft Audit Report**

<b>Findings</b>	<b>Recommendations</b>	<b>DHCD Response</b>
The final iteration of the Clearinghouse contains most required functional elements, but housing providers will have to input property and tenant information for the database to reach full capability.	9. DHCD should conduct an analysis to determine whether its existing staff is sufficient to address short-term demands associated with the public launch of the Rent Registry, and the long-term, ongoing needs related to operating and maintaining the database within the context of RAD’s other programmatic responsibilities.	This staffing Recommendation is prospective. DHCD conducts staffing assessments in the regular course of management, operations, and budgetary considerations. DHCD does not agree with this Recommendation, as the demand on existing staff is a result of the database being transferred to DHCD incomplete. The legislation required DHCD to oversee the database once complete and operationalized.

**Additional Responses/Comments**

- The RentRegistry Was Unfinished and Incomplete When Transferred to DHCD: The amended implementing legislation required the transfer of an operational rent control database to DHCD. An unfinished database was transferred to DHCD in 2023, and funds were not allocated to DHCD to support the completion of the project. Notwithstanding the challenges of receiving an incomplete and unfunded project, DHCD appropriated funding and completed the RentRegistry within two years.
- Go Live Status: DHCD suggests that the Draft Report distinguish the RentRegistry’s “go live” status as of the date that the database is substantially populated with data and information. The implementing legislation established a 90-day deadline from the date of release for all housing providers to register their rental accommodations using the new online platform. The deadline was recently extended by legislation to 180 days from the release date. DHCD’s view is that the “go live” date will be in effect when the RentRegistry is substantially populated and viable on Day 181.
- Contract Procurement Process: DHCD suggests that the Draft Report note the contract procurement process was not a joint effort between the Office of the Tenant Advocate (OTA) and DHCD. DHCD did not have the legal authority to create the RentRegistry and

undertake the procurement process, and served only as a subject matter expert until the database was transferred in 2023. DHCD also suggests that the Draft Report note that the contracting officer's (CO) contract vendor selection process for the project was not provided for this audit by the CO.

- Jurisdictional Comparison Chart (Draft Report pp. 16-18): The Draft Report shows jurisdictional comparisons including registration criteria. DHCD suggests that the Draft Report distinguish and clarify whether the registration frequencies are the rental accommodation registrations or rent adjustment registrations.
- RentRegistry Operations To Date: The audit scope was from October 1, 2015 through September 30, 2024. DHCD completed the RentRegistry in early 2025 and the database was released for public use on June 2, 2025. During an August 19, 2025 ODCA-DHCD meeting regarding the Draft Report, the auditor requested that DHCD's responses include a progress statement.

As of August 20, 2025:

- Over 7,000 users opened RentRegistry accounts (tenants and housing providers);
- 5,367 rental accommodation registrations (in progress, under review, or accepted were filed;
- 2,364 rental accommodation registrations were reviewed by RAD and accepted for filing;
- 1,456 rental accommodation registrations are under review by RAD;
- 123 registrations for tenants who are elderly or with a disability were filed; and
- 44 tenant petitions were filed.

The vendor remains engaged, attentive, and dedicated to resolving system errors and creating workaround solutions.

User feedback is mixed; as with any learning curve, there are users who navigate effortlessly through the new system and others who encounter challenges and obstacles (particularly high-volume users such as property managers). RAD continues to work with its stakeholders and the vendor to correct problems to create an excellent user experience and provide a high quality, reliable system.

To date, DHCD is focused on signing up users, assisting them with acclimating to the new process and system, and processing registrations. One outstanding facet is the Public Portal, which is a principal purpose of RentRegistry. The public at large and researchers will obtain information on the District's rental housing market through the

Public Portal. Inasmuch the RentRegistry has been active for only 11 weeks, there is little data populating in the system. DHCD and the vendor will commence work streamlining the Public Portal in the coming weeks.

DHCD also intends to establish quarterly meetings with DOB, DLCP, and OCTO to share and coordinate information, plan for system improvements and enhancements, prepare for technological or procedural changes, and other necessary exchanges to ensure there is no RentRegistry service interruptions.



**GOVERNMENT OF THE DISTRICT OF COLUMBIA**  
**Office of Contracting & Procurement (OCP)**



To: David McDaniels  
Auditor-in-Charge  
Office of the District of Columbia Auditor (ODCA)

From: Nancy Hapeman *Nancy Hapeman*  
Director and Chief Procurement Officer  
Office of Contracting and Procurement (OCP)

Date: August 22, 2025

Subject: OCP's Response to the ODCA Audit of The District's Rent Control Clearinghouse  
Database IT Project

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Thank you for the opportunity to respond to the recommendations in the ODCA audit report, *DC's New Rent Registry: A Decade of Delay*.

**ODCA Recommendation #1** - At the start of an IT project, OCP should discuss and document in the contract file a shared understanding of the procurement process and award type to be pursued with the implementing agency.

**OCP's Response**

At the start of IT projects, including the District's Rent Control Housing Clearinghouse Database IT project, OCP meets with implementing agencies to align on requirements, timelines, and the procurement approach, including the intended award type. OCP requires that all key documents, determinations, and approvals be maintained in the contract file. To strengthen continuity and transparency, OCP will reinforce documentation procedures to ensure that discussions with implementing agencies, including decisions regarding award type, are fully recorded in the contract file. This ensures that critical information is preserved and accessible for both current and future procurement staff.

**ODCA Recommendation #2** - OCP should establish timelines in their policies and procedures for the development and evaluation of the Scope of Work and Request for Proposals that include regular, periodic check-ins with the implementing agency.

**OCP Response**

OCP's Procurement Procedures Manual (PPM) provides high-level solicitation guidance. Detailed step-by-step instructions for developing and implementing schedules, including timelines and milestones are included in solicitation templates, which are separate procedural documents. Throughout the development and evaluation of the Scope of Work and RFP, OCP works closely with implementing agencies, holds regular check-ins, and maintains key updates, milestones and changes in the contract file.

**ODCA Recommendation #3** - OCP should establish a transition protocol for when there is a change in contracting officers following the award of a contract.



# GOVERNMENT OF THE DISTRICT OF COLUMBIA

## Office of Contracting & Procurement (OCP)



### OCP's Response

When a new contracting officer is assigned to a procurement after award, it is critical that the individual has a complete understanding of the procurement history and all subsequent post-award actions. OCP requires that all key procurement documents, determinations, and approvals be maintained in the contract file. To strengthen continuity and ensure completeness, OCP will reinforce documentation practices and review current transition protocols to determine whether additional procedures should be incorporated into guidance.

**ODCA Recommendation #4** – OCP should update policies and procedures to ensure contracting officers' independent assessments are completed and included in the contract file.

### OCP's response

OCP's Procurement Procedures Manual requires contracting officers to conduct and document independent assessments, including reviewing technical proposals, consulting with the evaluation panel chairperson, and comparing their own analysis to the panel's findings. These steps ensure that the contracting officer's evaluation reflects independent judgment and is properly recorded in the contract file. To strengthen this practice, OCP will reinforce procedures to ensure assessments are fully maintained in the contract file and provide refresher training for procurement staff to clarify documentation requirements and emphasize the importance of preserving these records.

**ODCA Recommendation #5** - OCP should update policies and procedures to require COs to notify in writing and provide a rationale to the members of the Technical Evaluation Panel prior to award of the contract when their recommendation is not accepted.

### OCP Response

The contract file must clearly reflect the contracting officer's rationale when the Technical Evaluation Panel's recommendation is not adopted, as well as when the recommendation is adopted. The PPM requires contracting officers to document their decision-making and ensure that the full history of the procurement is included in the contract file. This includes capturing key issues, the rationale for decisions, and any divergence from panel recommendations. Such decisions must be recorded in the official record.

To strengthen this practice, OCP will retrain the procurement staff on documentation requirements. OCP will also review whether updated guidance should be issued to clarify documentation expectations, ensure consistent implementation, and reinforce accountability.

We appreciate the Office of the District of Columbia Auditor's efforts in conducting this audit and remain committed to strengthening our procurement practices. Thank you for your valuable insights and recommendations.



August 29, 2025

Attn: Kathleen Patterson  
District of Columbia Auditor

**RE: OTA comments Re ODCA's Rent Registry draft report**

Dear Kathleen:

I am writing to share my thoughts on your draft report entitled: “**DC’s New Rent Registry: A Decade of Delay.**” Let me begin by commending your staff on the thorough job they have done in compiling the report. I am pleased to see that OTA’s concerns will be shared publicly, and hopeful that they result in positive change for the District. While I agree with most of your recommendations, I do have a few points of clarification and elaboration.

First, On page 6, the report states: “First DHCD then OTA did not meet statutory procurement deadlines necessary to begin development of the Clearinghouse database.” While it is true that the database was not completed within the initial statutory deadline, OTA never missed a deadline. Rather, when we became aware that the database would not be completed (due to factors beyond our control), we obtained from the Council a timely extension of the deadline.

Second, I wholeheartedly agree with recommendations 4&5 on page 9-10. Rather than act as a partner to OTA and guide us to choose the best vendor for our project, OCP’s CO made an independent decision that overruled the selection of the 5-member TEP. When OTA and RAD asked him to share the rationale for his decision, the CO stated that he was not required to do so and that his decision was beyond review. Such conduct does not serve the interests of the District residents or its agencies.

In addition to supporting recommendations 4&5, OTA would go further and make two additional recommendations:

1. OCP policies should be shared with the TEP at the onset of the technical review process, to ensure that the TEP is aware of the CO’s obligation to discuss his/her disagreement with the TEP. Without this knowledge, OTA and RAD took the CO at his word and did not attempt to appeal his decision.
2. An informal mediation process should be instituted in cases where there is a disagreement between the CO and the TEP that cannot be resolved among the parties.

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Finally, I'd like to highlight recommendation 8 on page 14. While I understood that the rent registry project would pose significant challenges, I could not have possibly imagined that a sister agency's refusal to share vital data would delay our project by more than a year – especially given how closely aligned OTA and DCRA's missions have been.

As noted in the report, the lack of specificity in the authorizing language contributed to the dispute among the agencies. One possible solution could be for the council to collaborate with the implementing agency to create more specifically tailored authorizing language.

Moreover, if a dispute among agencies does arise, I recommend implementing an inter-agency mediation process to allow for the resolution of such disputes without the need for judicial intervention.

Feel free to reach out to me or Amir Sadeghy to discuss these matters further.

Sincerely,

Johanna Shreve,  
Chief Tenant Advocate

OCTO's Managerial Response to ODCA's DC's New Rent Registry: A Decade of Delay

Findings	Recommendations	OCTO Response
<p>OTA's and DHCD's Contract Administrators lacked previous IT project management expertise, were not afforded regular guidance and support from OCTO subject matter experts and often relied on the contractor's technical expertise.</p>	<p>6. The D.C. Council should require OCTO to conduct an information technology (IT) "impact assessment" as a provision in any legislation that mandates development and/or implementation of a new District IT capability such as the Rent Control Clearinghouse database.</p> <p>7. OCTO should issue new guidance to all District agencies that: (a) reiterates and explains its authority to regulate the acquisition of IT systems throughout District government and (b) explains how and when District agencies' IT Project Managers should engage OCTO and ensure their projects receive the reviews required under the Policy.</p>	<p>6. "OCTO agrees that Council should require an IT impact assessment from OCTO as a provision in any legislation that mandates development and/or implementation of a new District IT capability. Production of such an impact assessment is an appropriate task for OCTO under its existing statutory authority. "New District IT capability" should be understood to apply District government-wide excepting only: the Council, the DC Auditor, and the Office of the Attorney General. "Information Technology" should be understood to include all software and data, telecommunications, and artificial intelligence capabilities.</p> <p>7. OCTO agrees, and will issue a CTO's Order addressing these points before the close of FY26 Q1.</p>
<p>During development of the Clearinghouse database, DCRA did not furnish data necessary for OTA and DHCD to meet legislative requirements.</p>	<p>8. OCTO should review Mayor's Order 2017-115 for revisions and updates and based on the review, collaborate with EOM to issue a new, updated version of the Mayor's Order, or, if changes are not deemed necessary, notify all stakeholders identified in it that the Order remains in effect.</p>	<p>8. OCTO agrees, and will issue a CTO's Order addressing these points before the close of FY26 Q1.</p>

# ODCA Response to Agency Comments

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We appreciate each agency's comments on the draft report and are pleased with their concurrence with nearly all of the report's findings and recommendations. Brief responses to each agency can be found below.

## DHCD

ODCA is pleased to see the Rent Registry's progress during the initial registration phase. We hope that this report, in particular the jurisdictional comparison, will inform DHCD's ongoing work to maximize the Registry's functionality and effectiveness for all users. The audit team is also encouraged by the prospect of interagency quarterly meetings that will facilitate crucial communication between key stakeholders in this program.

While we disagree with DHCD's statement that our recommendation to conduct an analysis of RAD's short term and long term staffing needs is "prospective," we were pleased to read that "DHCD conducts staffing assessments in the regular course of management, operations, and budgetary considerations." Given the sizable number of properties registering in the initial filing period and the necessary maintenance and tracking in the following months, ODCA hopes to ensure the Rental Accommodations Division is properly supported.

Finally, upon further review of our documentation from other jurisdictions, we believe the rental accommodations registrations and rent adjustment registrations are properly distinguished in the jurisdictional comparison and therefore did not make any changes to that language in the report.

## OTA

We appreciate the additional insight into the technical evaluation panel (TEP) process and the additional recommendations to increase transparency in the process. In its response, discussed further below, OCP acknowledges the importance of maintaining independent assessments by Contracting Officers (CO) and the need for clear communication between OCP and engaged agencies. The agency says it will "reinforce procedures" and retrain employees on documentation requirements.

## OCP

We are encouraged that OCP will review their guidance for leading IT procurements, mitigating the impact of staff turnover, and administering TEPs. The potential for additional procedures around document retention and communication will allow future cross-cutting projects to be executed more efficiently and effectively in the District.

## OCTO

Although OCTO was not initially engaged on this audit the necessity of their input on large IT projects became clear. Therefore, we are grateful for their thoughtful responses to our recommendations. The

audit team looks forward to the planned issuance of CTO order(s) on data sharing and IT acquisition before the close of FY 2026 Q1. Additionally, ODCA welcomes OCTO's assertion that an IT Impact Assessment is an "appropriate task for OCTO under its existing statutory authority."

We appreciate the collaboration and openness displayed by all four agencies over the course of this audit while we work together toward a more efficient and effective District government.

# About ODCA

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