

# DCHA “Substantially Complies” with OAG Consent Order

June 2, 2026 A report by the Office of the District of Columbia Auditor



Photos: Courtesy of DCHA

**Audit Team**  
Megan Crowder, Auditor-in-Charge  
Jeanelle Francis, Team Member  
Brian Churney, Audit Supervisor



**Kathleen Patterson, District of Columbia Auditor**  
[www.dcauditor.org](http://www.dcauditor.org)

# Table of Contents

---

Executive Summary.....	1
Background .....	2
Objective, Scope, and Methodology.....	4
Audit Results .....	6
Conclusion.....	19
Summary of Report Recommendations .....	20
Agency Comments .....	22
ODCA Response to Agency Comments.....	63
Appendix A: Consent Judgment and Order (No. 2020 CA 002740 B) .....	65
Appendix B: Work Order Review and Consent Order Review Methodology .....	76

# Executive Summary

## Why ODCA Did This Audit

ODCA conducted this discretionary audit to assess D.C. Housing Authority's (DCHA) compliance with the terms in the Consent Judgment and Order (No. 2020 CA 002740 B) (Consent Order).

## What ODCA Found

- The DCHA substantially complied with roughly half of reviewed requirements of the Consent Order related to public safety.
- DCHA did not remediate previously identified issues related to its property management system.
- DCHA did not close work orders related to exterior lighting, cameras, or doors within the time required by the Consent Order, potentially leaving safety hazards unaddressed.
- DCHA did not secure all vacant units, leaving them vulnerable to potential unauthorized access and nuisance activity.
- DCHA did not comply with the Consent Order's requirement to hire the required number of special police officers and did not deploy the required security coverage during 68% of the shifts reviewed.
- DCHA did not consistently complete walk-through checklists and did not create an online application to maintain checklists.
- Four properties had fewer cameras than reported to Office of the Attorney General for the District of Columbia (OAG), and DCHA did not install the point, tilt, and zoom (PTZ) cameras mandated by the Consent Order.

## What ODCA Recommends

- DCHA should develop policies and procedures regarding:
  - Data entry and status management that identify who is responsible for data cleanup once redundancies are removed.
  - Housing manager duties and transition protocols to ensure continuity when personnel changes occur.
  - Documents that should be digitized.
  - Establishment or identification of a central accessible location to store documents
  - A timeframe for addressing repairs and completing the documentation needed to close work orders.
  - Requirements to keep vacant units secure that include requiring periodic inspections of vacant units and delineating how to document inspections.
- DCHA should develop a security plan and conduct a security assessment at each property to determine the appropriate quantity and type of cameras needed.
- DCHA should develop and maintain an inventory of cameras at all properties, including camera installation dates.

# Background

---

## District of Columbia Housing Authority

The District of Columbia Housing Authority (DCHA), an independent authority, is responsible for providing “decent, safe, and sanitary dwellings, and related facilities, for persons and families of low- and moderate-income in the District.”<sup>1</sup> In addition to receiving significant District funds, DCHA receives funding from the U.S. Department of Housing and Urban Development (HUD) and its policies state that it carries out the housing program in accordance with federal law and regulations. HUD monitors DCHA to ensure it complies with legal and management responsibilities. One of DCHA’s core housing programs is the public housing program. Under this program, DCHA owns and manages public housing developments and acts as a landlord for DCHA properties. The agency’s responsibilities include ensuring that its housing programs comply with federal and local laws and regulations and agreements, establishing policies and procedures for operating housing programs, screening applicants for suitability as renters, maintaining housing units and properties by making repairs in a timely manner, collecting rent, and providing prompt and professional service.

Within DCHA, the Property Management Operations (PMO) Department is responsible for the management and maintenance of more than 8,000 public housing units across more than 50 communities in the District.

DCHA has an Office of Public Safety that consists of the DC Housing Authority Police Department (DCHAPD), a fully operational police force that provides “protection for [DCHA’s] residents, employees, and properties, both real and personal.”<sup>2</sup> DCHAPD is staffed with law enforcement officers who have full law enforcement authority, special police officers who have law enforcement authority on DCHA properties, and security officers who provide on-site security services but do not have law enforcement authority. Members of the DCHAPD who are employed as police officers and special police officers can execute any traffic citation or any criminal process issued by any court of the District, has concurrent jurisdiction with the Metropolitan Police Department (MPD), and has the same power of arrest as MPD.<sup>3</sup>

## Consent Judgment and Order

On June 9, 2020, the OAG filed a lawsuit in D.C. Superior Court against DCHA alleging that the agency failed to confront drug- and firearm-related nuisances at 10 public housing properties. These properties contained 2,567 units and housed more than 5,000 tenants.<sup>4</sup>

The Drug-, Firearm-, or Prostitution- Related Nuisance Abatement (Nuisance Act) authorizes the U.S. Attorney for D.C., OAG, or a community-based organization, to file an action against any person, which may include property owners and operators in order to remedy drug- and firearm-related nuisance activity

---

1 D.C. Official Code § 6-202(a) and (b).

2 D.C. Official Code § 6-223(a).

3 D.C. Official Code § 6-201(30).

4 <https://oag.dc.gov/sites/default/files/2020-06/DCHA-Complaint.pdf>

at a property.<sup>5</sup> Under the Nuisance Act, a nuisance is defined as any real property that unlawfully stores or keeps firearms or is used to sell or manufacture controlled substances or drug paraphernalia, and has an adverse impact on the community.<sup>6</sup>

On September 10, 2020, the OAG and DCHA entered into a Consent Order, which required DCHA to implement a comprehensive security plan at 10 public housing properties. See Appendix A for a copy of the Consent Order. The plan included physical infrastructure upgrades, enhanced security staffing, community collaboration, and other accountability measures. These measures were intended to mitigate drug- and firearm-related nuisances at the 10 properties. The 10 properties identified in the Consent Order are:

- Benning Terrace
- Carroll Apartments
- James Creek
- Kenilworth Courts (any property within Kenilworth Courts that is neither owned nor managed by DCHA is not subject to the Consent Order)
- Langston Terrace and Langston Additions
- LeDroit Apartments and Kelly Miller Dwellings
- Lincoln Heights
- Richardson Dwellings
- Stoddert Terrace
- Syphax Gardens

The Consent Order expired on September 10, 2025.

---

<sup>5</sup> D.C. Official Code § 42-3102.

<sup>6</sup> Ibid.

# Objective, Scope, and Methodology

---

## Objective

The objective of the audit was to determine whether the D.C. Housing Authority (DCHA) has complied with the terms in the Consent Judgment and Order (No. 2020 CA 002740 B).

## Scope

The audit scope was September 10, 2020, to December 15, 2025.<sup>7</sup>

## Methodology

To conduct this review, we:

- Reviewed the Consent Order (No. 2020 CA 002740 B).
- Met with employees from DCHA’s Office of Public Safety, PMO, Office of General Counsel, Information Technology (IT) Department, as well as the OAG and HUD.
- Conducted on-site visits at all 10 DCHA properties identified in the Consent Order. During each visit, the audit team walked the properties, recorded observations, and took pictures.
- Observed security cameras virtually to verify whether a sample of cameras were operational, the location, and any obstructions.
- Evaluated management’s design of control activities and whether management internally communicated quality information by reviewing walk-through documentation and light survey records maintained by the 10 housing managers.
- Assessed management’s design of control activities by analyzing work data in Yardi—DCHA’s end-to-end platform combining compliance, financial, and property management information in a centralized database—related to exterior lights, cameras, and doors (see Appendix B for a more detailed methodology of the audit team’s work order review process); observing a sample of vacant units at the 10 properties, reviewing special police officer and police officer hiring documentation, reviewing camera scope-of-work totals and final inspection documentation, reviewing the Office of Public Safety’s roll calls for evening and midnight shifts to confirm officers’ assignments, and reviewing barring-notice training materials.
- Assessed whether management used quality information establishing an online application by meeting with PMO and IT Department staff.
- Assessed management’s design of control activities and whether it externally communicated quality information by reviewing all monthly reports submitted to the OAG between September 2020 and September 2025, including barring notice reports, status of make ready unit reports, security personnel schedules, the camera equipment report, and the emails transmitting the reports.

---

<sup>7</sup> The audit scope was extended beyond the Consent Order’s expiration date to include the audit’s observations of the 10 properties.

- Assessed management’s remediation of identified control deficiencies by reviewing previous HUD and contractor assessments to identify findings related to inaccurate data and examining documents to determine whether the issues had been resolved.
- Requested and reviewed payments sent to OAG for the violence interruption program.
- Reviewed HUD guidance and an Admissions and Continued Occupancy Plan.
- Examined DCHA’s maintenance policy and procedure and Three-Year Recovery Plan.
- Reviewed relevant provisions of the D.C. Official Code and D.C. Municipal Regulations (DCMR).

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.<sup>8</sup>

---

<sup>8</sup> GAGAS 9.03.

# Audit Results

---

## **DCHA substantially complied with roughly half of reviewed requirements of the Consent Order related to public safety.**

DCHA complied with nine reviewed requirements of the Consent Order as outlined below. See Appendix B for a more detailed methodology related to the determination of which Consent Order items were reviewed. The remaining eight requirements are addressed in the subsequent findings.

### **Security cameras**

The Consent Order states, “DCHA shall provide to OAG and MPD the following information regarding all high-definition security cameras located on the Property: invoices, brand, serial number(s), and specific location(s) for each camera.”<sup>9</sup>

On December 24, 2020, DCHA provided an email to the OAG that included the security camera brands, serial numbers, and specific locations. We consider this substantial compliance even though the email was only addressed to OAG and did not include invoices.

### **“No Trespassing” and “No Loitering” signs**

The Consent Order states, “Within five (5) business days of signing this Consent Order, DCHA shall install and maintain signs in the common areas (e.g. sidewalks, stairways into buildings, common land) at the Properties that read: ‘For Resident Use Only. No Trespassing or Loitering by Others.’”<sup>10</sup>

As required, signs indicating no trespassing and no loitering were observed at all 10 properties. The audit team did not determine when signs were installed at the properties.

### **Securing entrances to residential buildings**

The Consent Order states, “If a Property has a security guard, the security guard shall require all guests entering the Property to sign into a visitor’s log.”<sup>11</sup>

The two properties with security officers had sign-in sheets on the day of the observation. They did not keep the sign-in sheets at the properties, and we did not document whether they were maintained for the period under the Consent Order.

---

9 See the Consent Order, section 2(b)iv.

10 Ibid, section 2(c)i.

11 Ibid, section 2(e)iii.

## **Vacant units**

The Consent Order states, "...DCHA proposes to rehabilitate approximately 250 units on the 10 properties..." and will "provide an update to the District as to the vacancy and construction status of those units monthly by e-mail by to [sic] undersigned counsel or other designees seven (7) days before the beginning of each new month."<sup>12</sup>

The vacancy and construction reports were included in each monthly report from October 2020 to November 2023, except March 2023 and April 2023, because, according to DCHA, there was no change to the number of rehabilitated vacant units. DCHA reported that it completed the rehabilitation of 256 units.

## **Physical security coverage**

The Consent Order states, "DCHA shall provide security personnel schedules (covering security personnel's names, contact information, location of coverage, coverages dates and times) to OAG by e-mail to undersigned counsel or other designees seven (7) days before the beginning of each new month."<sup>13</sup>

DCHA included in the monthly reports, all monthly patrol schedules and included the covering security personnel's names, contact information, location of coverage, coverages dates and times.

## **Barring notices**

The Consent Order states, "DCHA shall submit copies of all served barring notices with the monthly report that DCHA is to submit to the District seven (7) days prior to the beginning of each month."<sup>14</sup>

DCHA submitted to the OAG reports detailing 663 unique barring notices from September 2020 to September 2025. Barring notices were issued at all 10 properties.

The Consent Order states, "DCHA shall ensure that the armed DCHA officers and special police personnel on duty are trained to identify individuals who are the subject of barring notices, serve barring notices, and arrest (or call MPD to arrest) individuals who violate the barring notices when appropriate."<sup>15</sup>

DCHAPD provided a training document dated March 2018, titled "Barring Notice Protocol and Enforcement Procedures." The document included information on how to identify individuals who are the subject of barring notices, serve barring notices, and make arrests. DCHA stated it provided the barring notice training when officers were hired but only recently began to track who has received training. On October 7 and 9, 2025, the U.S. Attorney's Office (USAO) for the District of Columbia provided an updated training to DCHAPD, which included a section on barring notices.

The Consent Order states, "DCHA shall fully cooperate with the prosecution of criminal charges relating to activities on the Properties, including, but not limited to, providing oral or written testimony for litigation."<sup>16</sup>

---

12 Ibid, section 2(g)i.

13 Ibid, section 2(j)ii.

14 Ibid, section 2(k)ii.

15 Ibid, section 2(k)iii.

16 Ibid, section 2(k)iv.

USAO Chief Michael Spence stated that the DCHA Police Department has been a “valuable partner in bringing prosecutions involving DCHA,” and did not report any issues with DCHAPD cooperating with prosecution.

### **Violence interruption program**

With regard to violence interruption services, the Consent Order states, “DCHA shall pay to the District \$500,000, made in five \$100,000 annual payments, the first to be received by January 31, 2021, and the remaining payments to be received by the 31st of January for the four ensuing years through the last payment due January 31, 2025.”<sup>17</sup>

DCHA paid OAG \$500,000 in five annual installments for violence interruption services although two of the five payments were not made by the January 31 deadline.

---

### **DCHA did not remediate previously identified issues related to DCHA’s property management system.**

The Standards for Internal Control in the Federal Government, known as the Green Book, sets internal control standards for federal entities and may also be adopted by state, local, and quasi-governmental entities. Internal control is the process that management uses to help an entity achieve its objectives. Such controls help an entity run efficiently and effectively, report reliable information, and comply with laws and regulations.<sup>18</sup>

The Green Book states, “Management should remediate identified internal control deficiencies on a timely basis.”<sup>19</sup>

The 2020 Human Capital Initiatives assessment of PMO identified key concerns, including significant technology problems with the Yardi conversion, inaccurate data, and the use of manual spreadsheets to track data outside of Yardi.<sup>20</sup> The assessment also found that basic data, such as the number of units in a development and the vacancy status of those units, were inaccurate in Yardi. A 2022 assessment by HUD also found that DCHA did not maintain an accurate listing of vacant units and was not reporting an accurate status of units in the Inventory Management System/PIC Information Center (IMS/PIC), HUD’s central data repository used to monitor public housing data.<sup>21</sup> The Yardi system is intended to be an end-to-end platform combining compliance, financial, and property management information into a centralized database, which DCHA has used since 2018.

There were inaccuracies in the data for two properties DCHA provided from Yardi. James Creek’s Yardi

---

17 Ibid, section 4.

18 U.S. Government Accountability Office (GAO), Standards for Internal Control in the Federal Government, GAO-25-107721, published May 2025.

19 GAO, Standards for Internal Control in the Federal Government, GAO-25-107721, published May 15, 2025, p. 94.

20 The December 2020, Human Capital Initiatives, LLC assessment examined workforce structure, policies and procedures, ratios, technology, and PMO’s ability to work remotely.

21 U.S. Department of Housing and Urban Development, District of Columbia Housing Authority (DC001) Assessment (page 17).

report listed one unit as both occupied and vacant and listed the community room three times. Further, the housing manager recorded that three units were affected by a fire and stated the units were not listed as vacant in Yardi. The housing manager at Benning Terrace reported the total unit count for the property was 273 units—147 occupied units, 87 vacant units, and 41 units being worked on by a contractor. According to the housing manager, the units did not add up to 273, because two units had been merged into a six-bedroom unit. The housing manager stated Yardi did not reflect the updated unit information. DCHA reported that it is aware of the data discrepancies and is working with a contractor to clean the data and implement a quality control system.<sup>22</sup>

A 2024 three-year strategic goal of the PMO Department is to eliminate the use of spreadsheets and replace them with system reports in Yardi. Despite this goal, three of the 10 housing managers maintained Excel documents outside of Yardi, and the number of vacant units recorded in those Excel documents did not match the Yardi vacancy reports. James Creek’s Yardi report listed 41 vacant units, but the Excel document maintained by the housing manager listed 39 vacant units, three units affected by a fire, and one unit occupied by a squatter. Lincoln Heights’ Yardi report listed 118 vacant units, but the Excel document maintained by the housing manager listed 170 vacant units. Syphax Garden’s Yardi report listed 52 vacant units, but the Excel document maintained by the housing manager listed 82 vacant units.

There is confusion within DCHA regarding the process to fix inaccurate data in Yardi due to the absence of formal policies and procedures. One housing manager believed that “headquarters” was responsible for making updates in Yardi, an IT representative stated that housing managers should contact IT or the PMO to update Yardi data, and a PMO representative stated it is the housing manager’s responsibility to update unit information in Yardi. DCHA has engaged a contractor who is working to clean up data and develop standard operating procedures (SOPs) for data entry and status management.

Two of the three housing managers who maintained an Excel document outside of the system reported that they did so because Yardi data were inaccurate. The other housing manager stated that maintaining an Excel document was easier than using the system.

According to HUD, inaccurate and unreliable data can affect funding, performance scores, and technical assistance. Inaccurate data in Yardi can be transmitted through connected systems including HUD’s system, causing more errors and inaccurate internal reports and HUD reports. Moreover, data inaccuracies can undermine staff confidence in the system. Some housing managers reportedly lost trust in the system and consequently began to maintain documentation outside of the official system, which increases inefficiency and inconsistency. Further, if a manager moves to another property or leaves DCHA, the information in the Excel document may not be shared with the new housing manager.

Additionally, for DCHA leadership to monitor the agency’s compliance with the Consent Order, the data in Yardi needed to be accurate. Inaccurate data may skew the agency’s level of compliance.

---

<sup>22</sup> In a meeting on July 30, 2025, the contractor identified 7,326 discrepancies across various data points, including unit counts, unit codes, statuses, addresses, and bedroom sizes, in DCHA systems.

## Recommendation

1. DCHA should develop policies and procedures regarding data entry and status management that identify who is responsible for data cleanup once redundancies are removed.

---

### **DCHA did not complete work orders related to exterior lighting, cameras, or doors within the time required by the Consent Order, potentially leaving safety hazards unaddressed.**

The Consent Order required DCHA to repair or replace any non-functioning exterior lighting within five business days of receiving notice of defective light fixtures, cause non-operational cameras to be repaired and access to the footage to be restored within five business days, and, upon identification or report of a malfunctioning door at the Properties, repair or replace doors within one day if in-house supplies are available or within two days if an outside contractor is required.

DCHA utilizes Yardi to assign and track work orders at the properties. The work orders contain an audit history that logs the dates the work order was requested, scheduled, and completed.

DCHA did not complete work orders related to exterior lights within five business days in 61% of the work orders reviewed. Of the 74 exterior light work orders submitted between September 10, 2020, and September 3, 2025, that were reviewed, DCHA completed 37% within five business days of receiving notice of defective light fixtures and 61% in six or more business days. The exterior light work orders were completed anywhere from one to 413 business days after receiving notice, with a median of 26.5 business days.

DCHA did not complete work orders related to cameras within five business days in 64% of the work orders reviewed. Of the 304 camera work orders submitted between September 10, 2020, and September 3, 2025, that were reviewed, DCHA completed 36% within five business days of submission and 64% in six or more business days. The camera work orders were completed anywhere from one to 695 business days after being reported as non-operational, with a median of 11 business days.

DCHA did not complete work orders related to doors within one to two business days of being reported in 60% of the work orders reviewed. Of the 391 door work orders submitted between September 10, 2020, and September 7, 2025, that were reviewed, DCHA completed 40% within two business days and 60% in three or more business days. The door work orders were completed anywhere from one to 813 business days after being reported, with a median of four business days.

The audit team did not investigate the various specific reasons individual work orders were delayed, and Yardi did not track the reasons. A DCHA IT employee explained that a camera work order can be delayed for various reasons, including the time it takes to order parts, the approval process for purchasing items, the camera's physical location, or a failure to close the work orders after work is completed.

One contributing factor may have been that DCHA personnel reported being unaware of the Consent Order's timeliness requirements for these types of repairs. Current maintenance leadership reported

being unaware of the Consent Order’s work order timelines, and one reported being completely unaware of the Consent Order itself.

Additionally, DCHA’s PMO Maintenance Plan did not incorporate the Consent Order requirements, and the Consent Order’s timeframes did not align with DCHA’s internal policies and directives. The Consent Order required repairs to cameras and exterior lights within five business days, and door replacements within one to two business days, and did not reference a work order’s priority. The PMO Maintenance Plan defined when work orders should be completed based on whether they were categorized as “emergency” or “urgent,” but did not provide timeframes for when “routine” work orders should be completed.

Apart from the Consent Order requirements, there is also confusion within DCHA about when work orders should be completed. The PMO Maintenance Plan indicates that urgent work orders should be responded to within one to two days. The PMO maintenance manager, however, stated urgent work orders should be completed within 72 hours, and routine work orders should be completed within 21 days. During site visits, a foreman—and a document posted in a common area—indicated routine work orders should be completed within 16 days.

DCHA did not meet the timeframes outlined in its internal policy either. Specifically, DCHA did not complete any of the four reviewed exterior light work orders labeled as “emergency” within 24 hours and completed one of 14 reviewed exterior light work orders labeled “urgent” within two days, and 30 of 53 reviewed exterior light work orders labeled “routine” within 21 days.<sup>23</sup>

Additionally, DCHA completed seven of 66 reviewed camera work orders labeled as “emergency” within 24 hours, three of nine reviewed camera work orders labeled “urgent” within two days, and 131 of 221 reviewed camera work orders labeled “routine” within 21 days.<sup>24</sup>

DCHA completed 60 of 133 reviewed door work orders labeled as “emergency” within 24 hours, none of seven reviewed door work orders labeled “urgent” within two; days, and 121 of 202 reviewed door work orders labeled “routine” within 21 days.<sup>25</sup>

By not remediating exterior light, camera, and door work orders within established time frames, DCHA residents may have been exposed to heightened safety and security risks.

---

23 The counts of emergency, urgent, and routine exterior light work orders do not equal the total number of work orders reviewed because some work orders were labeled as “preventative maintenance.” The PMO Maintenance Plan defines preventative maintenance as visual inspections or seasonally required tasks and does not specify a required time frame for closing these the work orders.

24 The counts of emergency, urgent, and routine camera work orders do not equal the total work orders reviewed because some camera work orders were labeled as “preventative maintenance.”

25 The counts of emergency, urgency, and routine door work orders do not equal the total work orders reviewed because some work orders were labeled “preventative maintenance”, “NSPIRE”, “make ready”, and “court case.” The PMO Maintenance Plan did not include definitions or time frames for NSPIRE, make ready, or court case work orders.

## Recommendation

2. DCHA should develop, implement, and adhere to a policy that establishes a timeframe for addressing repairs and documentation needed to complete work orders and should communicate the policy to all staff at the properties.

---

### DCHA did not secure all vacant units, leaving units vulnerable to potential unauthorized access and nuisance activity.

The Consent Order required DCHA to secure all vacant units with boards and lock boxes within five days of signing the Consent Order. On learning of a unit becoming vacant the order required DCHA to secure the unit within seven business days. The Consent Order further required DCHA to ensure that all vacant units in the properties remained secured. DCHA's Public Safety Officers were required to check the security of vacant units on each shift, utilizing a report sheet. The Consent Order then directs the reader to Exhibit D for a sample report sheet.

In addition, the D.C. Municipal Regulations (DCMR) state, "Unoccupied buildings and buildings left uncompleted shall be protected by barricading, or other means, as to afford protection against accident to persons in or about the premises."<sup>26</sup>

Five of the 89 vacant units sampled across 10 properties were found unlocked on the date of inspection. The remaining 84 doors were locked, boarded up, or had a DAWGS door or lock box installed, depending on the unit's location. DAWGS doors are a vacant property security solution that allow for safe, reliable and managed access to a vacant property. It is a steel door guard that covers the door of a vacant unit and is described by its manufacturer as similar to a bank vault. According to a housing manager, the method of securing vacant unit varies based on the unit's location and whether the unit has previously been subject to tampering.

---

**Figure 1: Units Observed Unlocked on Date of Inspection (Listed by Property)**

Property	Date unit available	Date of inspection	Type of door
Langston Terrace	7/17/2025	10/9/2025	Unit inside apartment building- regular door
Benning Terrace	9/19/2025	10/17/2025	Townhouse - regular door
James Creek	4/28/2025	11/4/2025	Townhouse - regular door
LeDroit/Kelly Miller	1/20/2025	10/30/2025	Unit inside apartment building - regular door
Lincoln Heights	11/2/2022	10/21/2025	Unit inside apartment building - DAWGS door

Source: ODCA vacant unit inspections across 10 properties

---

<sup>26</sup> 14 DCMR § 900.2.

The five unsecured vacant units did not show evidence of unauthorized access or nuisance activity and the housing management team immediately locked the five units. DCHAPD did not ensure the security of the vacant units on each shift as required by the Consent Order.

Housing managers were instructed by former senior management to inspect all vacant units on the property on a monthly basis despite the Consent Order requiring Public Safety Officers to check vacant units on each shift. The monthly inspections were previously documented on a physical form and are now recorded in Yardi.<sup>27</sup> DCHA housing management may not have consistently conducted these inspections and was unable to produce records demonstrating that they occurred. Additionally, DCHA housing management may not have known to conduct monthly inspections of vacant units because the instructions were emailed, and two housing managers were not included on the email. The instructions had not been formalized in a written policy.

Two housing managers offered possible reasons a property unit was unsecured. One housing manager stated that a unit was unlocked due to bulk trash pickup, while another reported that another unit was unlocked because contractors were working on the unit. Contractors were not present during the site visit.

According to a DCHAPD officer, he did not document vacant units on a report sheet because DCHAPD was unaware of the reporting sheet requirement in the Consent Order.

Without regular inspections of vacant units, unsecured vacant units may allow unauthorized persons to gain access and engage in nuisance activity undetected.

## Recommendation

3. DCHA should develop, implement, and adhere to policies and procedures ensuring vacant units remain secure, requiring periodic inspections of vacant units, and outlining how to document the inspections.

---

### **DCHA did not comply with the Consent Order’s requirement to hire the required number of special police officers, and on 68% of the shifts reviewed, did not deploy the required security coverage.**

The Consent Order required DCHA to add six special police officers to its security personnel by October 31, 2020; and by January 31, 2021, to add six additional special police officers and two DCHA police officers to ensure that the properties had adequate security coverage over two shifts between 3 p.m. and 7 a.m., daily.

The Consent Order also required DCHA by January 31, 2021, to use the additional security personnel to supply security coverage for the two shifts each day as follows: three security personnel each covering Benning Terrace, Kenilworth Courts, Lincoln Heights, Richardson Dwellings, and Stoddert Terrace; two security personnel covering Carroll Apartments, James Creek and Syphax Gardens; one security person

---

<sup>27</sup> The physical form was introduced in January 2024, but it was unclear when DCHA switched to tracking the inspections in Yardi.

covering LeDroit Apartments and Kelly Miller Dwellings; and one security person covering Langston Terrace.

DCHA hired 12 of the 14 required security personnel by January 31, 2021. DCHAPD reported to OAG that the new hires included nine special police officers and three police officers.

Security coverage did not meet the requirements of the Consent Order in 68% of the roll calls reviewed. Specifically, 19 roll calls documented officers assigned to the properties, but not in the numbers specified in the consent order; seven roll calls reflected no officers assigned to one or more properties during a shift; and one roll call showed two officers scheduled for the entire shift.

DCHAPD was unable to locate 16 of the requested roll call records. The missing roll calls spanned from 2021 to 2025.

Recruitment and retention have proven to be difficult for DCHAPD. DCHA estimated that within a year, it lost over half of the personnel it hired. According to a DCHAPD representative, retaining officers is a major issue, and it was known that DCHA did not have a sufficient number of officers to meet the Consent Order's mandate.

DCHA was unable to locate the 2021 and 2022 roll calls because the Office of Public Safety relocated to a new building in 2023. According to a DCHAPD representative, the missing roll calls were either placed in storage or lost during the move. DCHA was unable to locate the 2023, 2024, and 2025 roll calls because the official responsible for submitting the roll calls forgot to include copies of the roll calls when emailing reports to the administrative email box.

By not scheduling the required number of officers to provide security coverage at DCHA properties, DCHA placed residents at greater risk and required increased reliance on other law enforcement agencies to assist in public safety matters.

Additionally, because DCHAPD could not locate some of the requested roll calls, it was not possible to verify whether DCHA met the Consent Order requirements during those specific shifts.

## Recommendations

4. DCHA should develop a security plan for each property.
5. DCHA should develop policies and procedures for document retention and retain documentation in a central location.

---

### **DCHA did not consistently complete walk-through checklists and did not create an online application to maintain checklists.**

The Consent Order required DCHA staff to walk each property at least once daily, nine times per week, using a checklist to ensure DCHA complied with the security requirements and to start within five days of

signing the order. Additionally, DCHA should maintain the checklist with an online application.<sup>28</sup>

The Green Book states, “Management should design control activities to mitigate risks to achieving the entity’s objectives to acceptable levels.”<sup>29</sup>

None of the properties completed the walk-through checklist at the rate described in the Consent Order. When walk-throughs were conducted, housing managers completed the checklists differently, and some could not provide all the checklists. Some housing managers recorded the walk-throughs daily, while others combined the walk-throughs into a single weekly document. One property’s walk-through documents were identical except for the dates. Other properties were missing entire years’ worth of the checklists. In one instance, a housing manager signed and backdated the walk-through checklists while the audit team was at the property. At one property staff did not complete the walk-through checklist and did not provide any documentation.

The light surveys were also recorded differently across the properties, and staff at some properties could not produce any light survey documentation. Some foremen reported creating work orders in lieu of the light survey, while others filled out the light survey, but only created a work order when lights were observed to be out. Maintenance staff differed on how they counted lights for the survey as well, with one foreman reporting he included individual unit porch lights in the count and a regional maintenance employee reporting only streetlights should be counted. One property did not complete the light survey and was unable to provide any documentation.

DCHA did not have an online application to store checklists. Instead, checklists and light surveys were primarily stored in binders or on shared computer drives.

Housing managers and maintenance staff may have recorded walk-through checklists and light surveys differently across the 10 properties because DCHA lacks policies and procedures requiring the completion of the checklists and, in general, did not provide sufficient guidance to staff regarding the requirements of the Consent Order. Some staff reported being unaware of the Consent Order and documents. One foreman, who had been employed by DCHA for four years, reported seeing the light survey for the first time only days before ODCA’s observation.

Documentation from previous housing managers could not be located, in part, because DCHA does not have a succession plan outlining expectations for record retention when a housing manager leaves a position. Some housing managers reported that their predecessors may have maintained documents on their computers, rather than in a central repository, and housing managers did not know where prior documentation had been stored.

A DCHA senior IT employee was unaware of the Consent Order’s requirement to create an online application for storing checklists. Additionally, senior PMO representatives were unsure why an

---

28 The checklist included two documents: (1) Securing Properties and Preventing Blight checklist; and (2) DCHA Light Survey Findings and Corrective Action.

29 GAO, Standards for Internal Control in the Federal Government, GAO-25-107721, published May 2025, p. 62.

application was not developed because none of them were employed at DCHA when the Consent Order took effect.

Failure to complete a daily checklist prevents verification that walk-throughs occurred and may ultimately result in safety issues going unaddressed. Because housing managers and maintenance staff did not complete forms uniformly or retain previous housing managers' documents, concluding whether checklists were completed was difficult and will remain challenging for any oversight entity, including DCHA management, in the future.

Because DCHA did not create an online application, documents were not stored in a central location, complicating the collection and review of records and preventing new housing managers from accessing documentation maintained by their predecessors.

## Recommendation

6. DCHA should develop policies and procedures, including:

- Outlining housing manager duties and transition protocols to ensure continuity when housing managers leave their position,
- Identifying the documents that should be digitized, and
- Identifying a central accessible location to store documents.

---

## Four properties had fewer cameras than reported to OAG, and DCHA did not install the PTZ cameras required by the Consent Order.

The Green Book states, "Management should design control activities to mitigate risks to achieving the entity's objectives to acceptable levels."<sup>30</sup>

The Consent Order required DCHA to use PTZ cameras near entrances of multifamily unit buildings as part of the security camera installation.

Four properties had fewer cameras in November 2025 than were listed on DCHA's November 2020 security monitoring equipment list.

---

<sup>30</sup> GAO, Standards for Internal Control in the Federal Government, GAO-25-107721, published May 15, 2025, p. 62. Attribute 10.04 states, "Management clearly documents the performance of control activities and all transactions and other significant events that occur in a manner that allows the documentation to be readily available for examination. Documentation and records are properly managed and maintained."

Figure 2: DCHA Camera Totals Across 10 Properties<sup>31</sup>

Properties	Scope of work 7/2/2020 <sup>32</sup>	Camera totals reported in November 2020	Record of Contract Inspections and Acceptance	Camera total on 11/18/25
Benning Terrace	87	87	87	83
James Creek	90*	60	unable to locate document	60
Kelly Miller	50**	57	unable to locate document	49
Kenilworth***	97	75	unable to locate document	75
Langston Terrace	41	47	unable to locate document	51
LeDroit	50**	33	unable to locate document	43
Lincoln Heights	77	77	unable to locate document	77
Richardson Dwelling	56****	56	unable to locate document	54
Stoddert Terrace	64	64	unable to locate document	62
Syphax Gardens	90*	30	unable to locate document	40
<b>Total</b>	<b>562</b>	<b>586</b>		<b>594</b>

Sources: DCHA Scope of Work, DCHA Equipment List, Record of Contract, DCHA employee, and ODCA observation

\*James Creek and Syphax Gardens camera quantities were reported as one in the Scope of Work.

\*\*LeDroit Apartments and Kelly Miller Dwellings camera quantities were reported as one in the Scope of Work.

\*\*\*Kenilworth's camera totals are less than the scope of work because some of the buildings at the property were demolished.

\*\*\*\*The scope of work states 56 cameras will be installed at Richardson Dwelling, but the December 2020 PowerPoint emailed to OAG states OAG requested 54 cameras at the property.

DCHA could only produce the “Record of Contract Inspections and Acceptance” for Benning Terrace. This document, a DCHA form, certified that all work had been satisfactorily completed. DCHA was unable to locate the documents for the other nine properties.<sup>33</sup>

DCHA was unable to locate 2 of 72 randomly sampled camera IP addresses on the day of ODCA's observation, and an additional two cameras had different IP addresses because the cameras had been reset.

31 The Carroll Apartments were not included in the Scope of Work. Arthur Capper Apartments were included, however, the December 2020 PowerPoint emailed to OAG states the apartments were managed by a third party and the requirements were not executed.

32 The Scope of Work provided the project requirements necessary for DCHA to comply with the physical security implementation agreement with OAG.

33 ODCA sent multiple email requests for the documentation from September 29, 2025, to January 26, 2026.

**Figure 3: DCHA Missing Cameras and IP Addresses from 72 Randomly Sampled Cameras**

Property	Camera address	IP address	Notes/reason missing
<b>Unable to locate</b>			
Benning Terrace	4450 G Street SE Washington, DC 20019	10.31.0.184	Not sure, unable to locate, and not on server.
Richardson	5246 Clay Street NE Washington DC 20019 (back)	10.50.0.108	Not sure, unable to locate.
<b>New IP address-unable to verify if it is the same camera</b>			
Kelly Miller	238 W Street NW Washington, DC 20001	10.32.0.113	Camera was reset, and it was given a new IP address.
LeDroit	2125 4th Street NW Washington, DC 20001	10.32.0.169	Camera was reset.

**Source: ODCA inspection**

DCHA did not install PTZ cameras at the 10 properties. Instead, the cameras installed at the 10 properties only had capacity to zoom in and out and required manual tilting.

The DCHA employee responsible for the cameras was unable to explain the discrepancy in the number of cameras at four of the properties or why two cameras could not be located. The DCHA employee stated that the camera vendor was currently investigating these issues. Further, the DCHA employee was unsure why PTZ cameras were not installed because he did not oversee the camera installation process in 2020.

ODCA was unable to determine conclusively why DCHA could not locate the nine final inspection documents. Potential reasons for the lack of documentation include staff turnover and inadequate document retention by DCHA.

The absence of camera documentation made it difficult to determine how many cameras that DCHA accepted and installed in 2020, and why discrepancies existed between what was reported to OAG in 2020 and what was observed in November 2025. Additionally, without proper documentation, DCHA could not determine what happened to the missing cameras.

Cameras not having the capabilities required in the Consent Order may diminish safety and security at the properties.

## **Recommendations**

7. DCHA should conduct a security assessment at each property and determine the quantity and type of cameras needed.
8. DCHA should develop and maintain an inventory of cameras at all properties, including the date of each camera installation.

# Conclusion

---

The Consent Order expired on September 10, 2025. Accordingly, rather than recommending compliance with the requirements of the Consent Order, this report offers recommendations that address the systemic factors that prevented DCHA from fully implementing the required measures. Throughout the audit, three themes emerged repeatedly as areas DCHA could improve to ensure compliance with present and future requirements.

1. DCHA needs to establish clear written policies and procedures.
2. DCHA needs to ensure staff are trained on those expectations.
3. DCHA should routinely monitor compliance with these policies.

Strengthening these foundational practices will enhance consistency and operational stability by documenting expectations and supporting continuity of operations during staff transitions. These improvements will also enhance internal communication and coordination and ultimately improve public safety across all DCHA properties.

# Summary of Report Recommendations

Our audit identified eight recommendations that could improve operations at the District of Columbia Housing Authority.

Findings	Recommendations
DCHA substantially complied with roughly half of reviewed requirements of the Consent Order related to public safety.	There are no recommendations for this finding.
DCHA did not remediate previously identified issues related to DCHA's property management system.	<b>1.</b> DCHA should develop policies and procedures regarding data entry and status management that identify who is responsible for data cleanup once redundancies are removed.
DCHA did not close work orders related to exterior lighting, cameras, or doors within the time required by the Consent Order, potentially leaving safety hazards unaddressed.	<b>2.</b> DCHA should develop, implement, and adhere to a policy that establishes a timeframe for addressing repairs and documentation needed to close work orders and should communicate the policy to all staff at the properties.
DCHA did not secure all vacant units, leaving units vulnerable to potential unauthorized access and nuisance activity.	<b>3.</b> DCHA should develop, implement, and adhere to policies and procedures ensuring vacant units remain secure, requiring periodic inspections of vacant units, and outlining how to document the inspections.
DCHA did not comply with the Consent Order's requirement to hire the required number of special police officers, and on 68% of the shifts reviewed, did not deploy the required security coverage.	<b>4.</b> DCHA should develop a security plan for each property. <b>5.</b> DCHA should develop policies and procedures for document retention and retain documentation in a central location.
DCHA did not consistently complete walk-through checklists and did not create an online application to maintain checklists.	<b>6.</b> DCHA should develop policies and procedures, including: <ul style="list-style-type: none"><li>■ Outlining housing manager duties and transition protocols to ensure continuity when housing managers leave their position,</li><li>■ Identifying the documents that should be digitized, and</li><li>■ Identifying a central accessible location to store documents.</li></ul>

---

Four properties had fewer cameras than reported to OAG, and DCHA did not install the PTZ cameras required by the Consent Order.

**7.** DCHA should conduct a security assessment at each property and determine the quantity and type of cameras needed.

**8.** DCHA should develop and maintain an inventory of cameras at all properties, including the date of each camera installation.

---

# Agency Comments

---

On May 1, 2026, we sent a draft copy of this report to the District of Columbia Housing Authority (DCHA) for review and written comment. DCHA responded with comments on May 22, 2026. Agency comments are included here in their entirety.



## District of Columbia Housing Authority

300 7th Street, SW | 10th Floor  
Washington, DC 20024  
(202) 535-1000 | dchousing.org

---

Nicole Wickliffe, Interim Executive Director

May 22, 2026

Kathleen Patterson  
District of Columbia Auditor  
1331 Pennsylvania Avenue NW, Suite 800 South  
Washington, DC 20004

**Re: Response to Draft Report Entitled “Review of DCHA Compliance with OAG Consent Order”**

Dear Ms. Patterson:

This correspondence responds to the above-referenced draft audit report (the “**Draft Audit**”), which was received by the District of Columbia Housing Authority (“**DCHA**”) on May 1, 2026. This response is being provided timely pursuant to an extension granted by the DC Auditor.

### OVERVIEW

By way of background, on September 10, 2020 – just a few months into the COVID-19 pandemic – DCHA entered into a five-year Consent Judgment and Order (the “**Consent Order**”) with the District of Columbia Office of Attorney General (“**OAG**”) to resolve complaints OAG alleged about drug and firearm activity at ten public housing properties (collectively, the “**Sites**”) owned and operated by DCHA. The Consent Order included multiple components generally intended to promote security and safety at the Sites. The Consent Order expired by its own terms on September 10, 2025, after which point DCHA had no legal obligation to continue following any of the requirements of the Consent Order. Thus, as of this writing, the Consent Order expired many months ago. At no point during the Consent Order’s five-year term did the OAG issue to DCHA a Notice of Default of provisions of the Consent Order or seek to hold DCHA in contempt of the Consent Order in court. Thus, as far as DCHA is aware, the OAG was satisfied with DCHA’s performance under the Consent Order and all questions or issues the OAG may have had during the term of the Consent Order were resolved to OAG’s satisfaction.

We recognize that the DC Auditor and its team sought to be constructive and thoughtful in its review of DCHA’s compliance with the now-expired Consent Order. Given that the Consent Order has now expired, and given that the DC Auditor’s Site visits all occurred after the termination of the Consent Order, we are responding to the Draft Audit with the foregoing in mind. We strongly disagree that there was any material noncompliance with the Consent Order, but we certainly appreciate recommendations for ways that DCHA can continue to ensure that DCHA properties remain secure. Safety and security at DCHA communities is always a priority for DCHA.

DCHA is committed to providing equal access to this event for all participants & residents with disabilities. If you need a reasonable accommodation, please contact our ADA/504 Department at [ADA504@dchousing.org](mailto:ADA504@dchousing.org) with your complete request. If you need a sign language or foreign language interpreter, please go to [dchousing.org/language](http://dchousing.org/language) or call 202-535-1000. Please allow at least 3 business days to make the necessary arrangements.

Since the Consent Order was signed in 2020, much has changed with DCHA's internal operations, with security technology, and with DCHA's approaches to public safety. Accordingly, even in areas where we note disagreement with specific recommendations of the Draft Audit, we try to explain *why* we believe DCHA achieves similar outcomes intended by the recommendations even if we now utilize or propose alternate methods.

As discussed in more detail in the below response, DCHA has invested heavily over the past few years in its security cameras at the Sites and other properties. Cameras were placed only after developing plans involving DCHA Office of Public Safety ("OPS") leadership, DCHA Information Technology Department ("ITD") leadership and experts, and often Metropolitan Police Department ("MPD") members. Further, DCHA's OPS partners with MPD and other law enforcement to patrol the Sites and other properties on a regular basis. OPS regularly issues barring notices to non-residents who engage in criminal activity at the Sites, and also coordinates with landlord/tenant counsel to terminate tenancies for public housing residents whose household members or guests commit serious crimes that threaten the health, safety or welfare of DCHA communities. Unfortunately, crime still exists in many neighborhoods around the Sites, but DCHA is committed to working with our resources, our stakeholders, and our residents to continue to improve safety and security in our communities.

#### **RESPONSES TO AUDIT FINDINGS AND RECOMMENDATIONS**

***Finding:*** DCHA substantially complied with roughly half of reviewed requirements of the Consent Order related to public safety.

***DCHA Response:*** The Draft Audit found substantial compliance with nine requirements it reviewed. We are pleased that the auditors determined there was substantial compliance with these requirements, including: provision of information on security cameras; installation of security signage; securing entrances to residential buildings; documenting rehabilitation of 250<sup>1</sup> vacant units; reporting on security coverage; issuance of barring notices<sup>2</sup>; and payment of all amounts owed to support violence interruption programs. As there were no recommendations for this finding, no further response is provided.

***Finding:*** DCHA did not remediate previously identified issues related to DCHA's property management system.

***ODCA Support for Finding:*** The Draft Audit, citing the Standards for Internal Control in the Federal Government, known as the "Green Book," recommends that internal control deficiencies should be remediated timely. The Draft Audit also cites a 2020 internal review of DCHA's Property Management Operations ("PMO")

---

<sup>1</sup> As noted in the Draft Audit, DCHA rehabilitated more than the required number of units.

<sup>2</sup> As noted in the Draft Audit, DCHA reported that 663 unique barring notices were issued at the Sites to non-residents during the term of the Consent Order. The Draft Audit also notes that USAO Chief Michael Spence stated that OPS has been a "valuable partner" in prosecutions involving DCHA.

Department and a 2022 HUD assessment of DCHA, both of which identified issues with public housing data.

***ODCA Recommendation 1:*** DCHA should develop policies and procedures regarding data entry and status management that identify who is responsible for data cleanup once redundancies are removed.

***DCHA Response:*** DCHA notes, first, that this finding and the related recommendation is not directly tied to compliance with a specific Consent Order provision, but rather to an observation and recommendation regarding ensuring accurate data for purposes of monitoring compliance with the Consent Order. We also note that the Green Book is not directly applicable to DCHA; as noted in the Draft Audit, it is a guideline for Federal agencies, and DCHA is not a Federal agency.

Nonetheless, DCHA agrees that accurate data is important, and has spent significant time over the past few years working to address these types of issues, which unfortunately are taking substantial time to rectify. We further agree that using Excel spreadsheets or similar external methods as primary means of documentation is both inefficient and unsustainable. Not only does DCHA agree with this recommendation, but it has already been implemented.

Under DCHA's Three Year Recovery Plan which commenced in June 2024, PMO is charged with fully implementing Yardi features, training staff to increase the level of reporting and eliminate housing management team members use of spreadsheets. PMO actively monitors and updates HUD's IMS/PIC system to ensure accuracy with public housing data and requests coordination from DCHA's HUD PIC Coach to assist with PIC updates when needed. PMO has also developed a standard operating procedure ("SOP") for data clean-up, which is included at [Attachment 1](#).

***Finding:*** DCHA did not complete work orders related to exterior lighting, cameras, or doors within the time required by the Consent Order, potentially leaving safety hazards unaddressed.

***ODCA Recommendation 2:*** DCHA should develop, implement, and adhere to a policy that establishes a timeframe for addressing repairs and documentation needed to complete work orders and should communicate the policy to all staff at the properties.

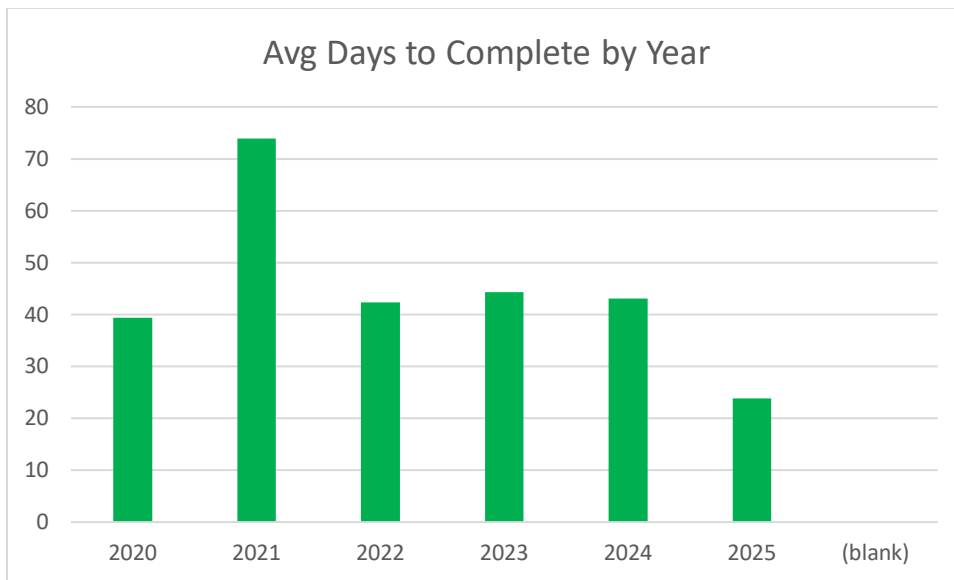
***DCHA Response:*** As discussed below, DCHA agrees with the recommendation and has largely already implemented it. While DCHA disagrees with assertions of noncompliance with the Consent Order, we do note that completion of work orders have been challenging in recent years for a variety of reasons – one of which was the COVID-19 pandemic, which lasted far longer than anyone could have anticipated at the time the Consent Order was executed. For PMO, the pandemic-related staffing and parts shortages and resident concerns about interacting in person with staff exacerbated many issues.

With respect to meeting the Consent Order's standard for security cameras, the standard was operationally challenging to achieve given the complexity of maintaining large-scale security infrastructure across multiple properties. Individual camera failures can often be resolved within

the required timeframe when replacement parts, staffing, and site access are readily available. However, broader issues affecting camera systems including construction activity, electrical outages, network disruptions, vendor backorders, supply chain limitations, staffing shortages, and pandemic-related operational impacts can significantly extend repair timelines. These challenges were particularly acute during the COVID-19 pandemic and subsequent global supply chain disruptions, which affected technology procurement and infrastructure support nationwide.

Fortunately, an individual camera outage did not necessarily result in a complete loss of security coverage. Many DCHA properties utilize overlapping camera fields of view, allowing adjacent cameras to continue recording affected areas while repairs are underway. Also, many cameras reported as non-operable are simply not showing feeds at security monitoring stations but are still recording.

In 2022, responsibility for camera oversight and support transitioned to DCHA's ITD. Since that transition, DCHA has implemented significant modernization and maintenance improvements, including replacing aging infrastructure, centralizing management of camera systems, and improving repair coordination processes. These efforts substantially improved repair response times over time. By 2025, average repair times had decreased to approximately 23 days, reflecting measurable operational progress despite the size and complexity of the agency's camera network.



Commercial security system maintenance practices commonly recognize that repair timelines may exceed five business days depending on infrastructure issues, equipment availability, vendor support constraints, and the scope of repairs required. Comparable local government camera requirements also recognize that repairs may require extended timeframes. For example, Prince George's County legislation requiring security cameras at multifamily residential properties allows repair periods of up to 14 days before enforcement penalties apply.<sup>3</sup> DCHA remains committed to continuing operational improvements and reducing repair timelines wherever feasible.

---

<sup>3</sup> See NBC Washington, "[Prince George's approves requiring security cameras at some apartment buildings, senior residences.](#)"

In terms of implementation of the Draft Audit's recommendation, under DCHA's Three Year Recovery Plan, PMO's maintenance team was required to develop or revise its maintenance policies and SOPs, and has done so. [Attachment 2](#) includes PMO's established timeframe for addressing repairs and the documentation needed for closing work orders. We note these are consistent with HUD recommendations for work orders. As such, we believe this recommendation has been completed for PMO-related work orders.

With respect to security cameras, and in coordination with OPS and PMO, ITD will develop and communicate formal policies and an SOP related to camera-specific work order submission, prioritization, tracking, and closure requirements. DCHA is targeting 90 days for completion of this SOP and related communication.

***Finding:*** DCHA did not secure all vacant units, leaving units vulnerable to potential unauthorized access and nuisance activity.

***ODCA Support for Finding:*** Citing the Consent Order, and 14 DCMR 900.2 (which provides that vacant *buildings* should be secured) the Draft audit indicates that five of 89 vacant units sampled across the 10 Sites were found unlocked on the date of inspection. The remaining 84 were otherwise secured. Housing managers provided rationales for at least two of the unlocked units.

***ODCA Recommendation 3:*** DCHA should develop, implement, and adhere to policies and procedures ensuring vacant units remain secure, requiring periodic inspections of vacant units, and outlining how to document the inspections.

***DCHA Response:*** The Site visits occurred after the conclusion of the Consent Order, thus the five unlocked units cannot be a violation of the Consent Order. We also note, as the housing managers did during the Site visits, that there can be valid reasons for vacant units to be unlocked at certain times, particularly during work hours: contractors may be performing work or units may be undergoing an inspection, for example. We also note that the DC regulations cited appear to apply more to vacant buildings more so than individual units within a housing structure.

Nonetheless, DCHA does agree with the Draft Audit that it is important to ensure that vacant units are appropriately secured. PMO has implemented operational procedures and reinforced expectations related to securing vacant units, conducting periodic inspections, and documenting vacancy conditions. PMO has issued guidance to housing management and maintenance staff regarding vacancy monitoring, unit security protocols, inspection documentation, and oversight measures to improve consistency, accountability, and compliance across the portfolio. Included at [Attachment 3](#) are recent formal and informal guidance provided to housing managers by senior PMO management to ensure that appropriate follow up is occurring.

Accordingly, DCHA confirms that it agrees with and has complied with this Recommendation 3.

***Finding:*** DCHA did not comply with the Consent Order’s requirement to hire the required number of special police officers, and on 68% of the shifts reviewed, did not deploy the required security coverage.

***ODCA Recommendation 4:*** DCHA should develop a security plan for each property.

***ODCA Recommendation 5:*** DCHA should develop policies and procedures for document retention and retain documentation in a central location.

***DCHA Response:*** DCHA agrees with both recommendations. DCHA has already complied with Recommendation 4, as further discussed below, and will comply with Recommendation 5.

As the Draft Audit notes, retention of police officers has been a significant issue for DCHA OPS and is a core part of OPS’ Three Year Recovery Plan. OPS has developed key working relationships with MPD and other law enforcement as well, which does not fully address the staffing issue, but the collaboration is one way that OPS works to maximize local resources.

As discussed in more detail below with respect to Recommendation 7, in 2024 and 2025, OPS, MPD and ITD developed security assessments for each Site to ensure that camera technology would be appropriately deployed. Additionally, OPS regularly staffs each Site based on the evolving security needs at each property. While DCHA generally agrees that a security plan can be helpful, the evolving security needs of DCHA sites do not lend themselves to static plans such as those that were in the Consent Order.

OPS has established written Post Orders (which are security plans) for all locations and buildings staffed by Security Officers and Special Police Officers. For all other properties, daily deployment is addressed through the analysis of crime trends and the implementation of prevention strategies. Deployment efforts also include partnerships with outside agencies (discussed further below).

Currently OPS has dedicated patrols during the evening and midnight shifts to cover the Sites within the capabilities of the present staffing level. DCHA recently added Patrol Finder to member’s mobile phones. This is a software application that police officers utilize when patrolling and walking DCHA properties. It logs when members are present at certain locations on Sites. OPS has also recently set up vertical checkpoints inside of DCHA high-rise buildings and walk-up buildings to ensure police officers walk the entire properties. OPS members on patrol are required to ticket abandoned vehicles and unauthorized vehicles and remove them daily to prevent blight and ensure that Site parking is reserved only for residents, staff, and other authorized persons. OPS members routinely attend resident council meetings to discuss any concerns that residents may have and provide updates when needed.

In FY2026, OPS was awarded a \$50,000 traffic grant for overtime and traffic related equipment. The Department uses the grant to conduct traffic enforcement on DCHA properties. This is a two-prong approach, as it gives a high visible presence in the communities and shows that OPS enforces traffic laws throughout DCHA’s portfolio.

OPS has also established a substation in Greenleaf Gardens. The purpose is to have officers and resources on the southwest properties and deploy manpower daily from the substation itself. The opening of the substation has allowed OPS the ability to establish a high visible presence and has enhanced police interaction with the residents and managers at Greenleaf Gardens, James Creek and Syphax Gardens.

As indicated, plans are never static; OPS evaluates its security plans on a nearly daily basis for adjustments and coordination.

As noted above, attrition and retention of members is an ongoing challenge. The agency has put in place obligated service agreements to all new hires in an effort to curtail resignations. However, the challenges are relentless from larger police departments that offer hefty upfront cash incentives and pensions.

OPS has established a Criminal Investigative Division (“CID”) that works closely with MPD to enhance the prosecution of violent offenders on DCHA properties. The members are deployed to all major crimes that occur on DCHA properties and conduct follow up investigations. This unit works closely with the United States Attorney Office and the District of Columbia Office of the Attorney General regarding on-going cases and training.

As indicated above, DCHA collaborates with other law enforcement to maximize local resources. OPS coordinates daily with the MPD and our federal partners to conduct targeted high visibility patrols during the evening tour of duty. This is evaluated weekly to ensure that our members are targeting locations that show a change in crime trends. OPS command officials attend MPD’s Crime Briefings twice a week to discuss crime, crime trends and planned events.

OPS criminal Intelligence is also shared with MPD in reference to on-going issues on DCHA properties. This provides a shared interest between both police departments.

Additionally, two OPS Crime Analysts are assigned to MPD’s Real Time Crime Center (“RTCC”) to obtain real time crime statistics on a daily basis. This information is disseminated to OPS command staff daily to determine where manpower is deployed and to address criminal activities on all properties. In addition, the crime analysts forward all critical law enforcement alerts and lookouts to OPS patrol members immediately.

Further, OPS has partnered with the US Army National Guard to deploy resources and manpower into DCHA communities to support OPS daily patrols.

DCHA agrees with Recommendation 4 but strongly asserts that such plans should be flexible and not static. As described above and in Recommendation 7, DCHA has already complied with this recommendation 7.

DCHA also agrees with Recommendation 5. Currently, OPS utilizes an administrative email inbox for all Watch Commander Reports and Roll Calls to ensure that this documentation is stored digitally instead of in boxes which can be lost. Supervisors are required to submit this

documentation daily. OPS will develop a General Order on document retention to ensure that future OPS administrations will have a permanent stored location for administrative matters.

**Finding:** DCHA did not consistently complete walk-through checklists and did not create an online application to maintain checklists.

**ODCA Support for Finding:** Citing the Green Book<sup>4</sup> and Consent Order, the finding raised concerns about the frequency and record keeping related to walk throughs.

**ODCA Recommendation 6:** DCHA should develop policies and procedures, including:

- Outlining housing manager duties and transition protocols to ensure continuity when housing managers leave their position,
- Identifying the documents that should be digitized, and
- Identifying a central accessible location to store documents.

**DCHA Response:** DCHA agrees with the recommendation generally, however we do not necessarily believe that detailed record keeping about site walk throughs is necessary. The first bullet point has already been completed. Please see at Attachment 4, the transitional document used by area or housing managers when properties are reassigned.

In terms of the general recommendation, DCHA recognizes the importance of standardized documentation retention and operational continuity. PMO is actively working collaboratively with DCHA's ITD and the Office of Public Affairs and Communication ("OPAC") to strengthen document management practices, identify documents appropriate for digitization, reinforce transition expectations for housing management staff, and establish a centralized electronic repository for reports and supporting documentation to improve accessibility, oversight, and long-term record retention. We anticipate in the next year, as part of the Three Year Recovery Plan, that PMO will have a more concrete process in place for achieving the foregoing.

**Finding:** Four properties had fewer cameras than reported to OAG, and DCHA did not install the point-and-tilt-zoom cameras required by the Consent Order.

**ODCA Recommendation 7:** DCHA should conduct a security assessment at each property and determine the quantity and type of cameras needed.

**ODCA Recommendation 8:** DCHA should develop and maintain an inventory of cameras at all properties, including the date of each camera installation.

**DCHA Response:** DCHA agrees with the recommendations (with a minor exception detailed below with respect to Recommendation 8) but has already complied with and completed them. Further explanation follows.

---

<sup>4</sup> As noted above, the Green Book is not directly applicable to DCHA.

The inventory discrepancies identified in the audit are based on camera counts reported to OAG in 2020 at the beginning of the Consent Order period versus the count after the end of the Consent Order. As such, there is not a violation of the Consent Order.

In 2022, DCHA's Information Technology Department assumed responsibility for camera oversight and support across the agency. Since that time, DCHA has conducted updated security assessments, modernized multiple camera systems, replaced aging infrastructure, and installed new cameras where operationally necessary.

As camera systems were modernized, camera layouts and counts evolved based on updated security assessments, operational requirements, building changes, and improvements in camera technology. Although some properties may currently have fewer cameras than originally reported in 2020, the existing systems provide sufficient (and often improved) coverage to secure the properties and monitor critical security areas. Effective security monitoring is based on overall coverage quality, reliability, resolution, retention capability, and operational effectiveness rather than camera quantity alone.

Modern multi-megapixel fixed camera systems now provide operational advantages over traditional point-tilt-zoom (“PTZ”) configurations in many environments. The systems deployed by DCHA provide continuous wide-area recording with high-resolution digital zoom capabilities, allowing footage review and forensic analysis without requiring continuous manual operation.

By contrast, PTZ cameras generally require active monitoring and manual operation in order to effectively track activity in real time, making them substantially more resource-intensive and increasing the potential for human error or missed coverage areas when cameras are repositioned. The modern camera systems currently deployed by DCHA continuously record all covered areas at high resolution without requiring 24-hour manual intervention.<sup>5</sup>

DCHA believes the currently deployed systems provide enhanced reliability, broader continuous coverage, and more efficient long-term operational performance while supporting the agency's public safety objectives. Installing additional cameras solely to maintain historical inventory counts, absent an operational need identified through security assessment, would not represent the most effective use of limited agency resources.

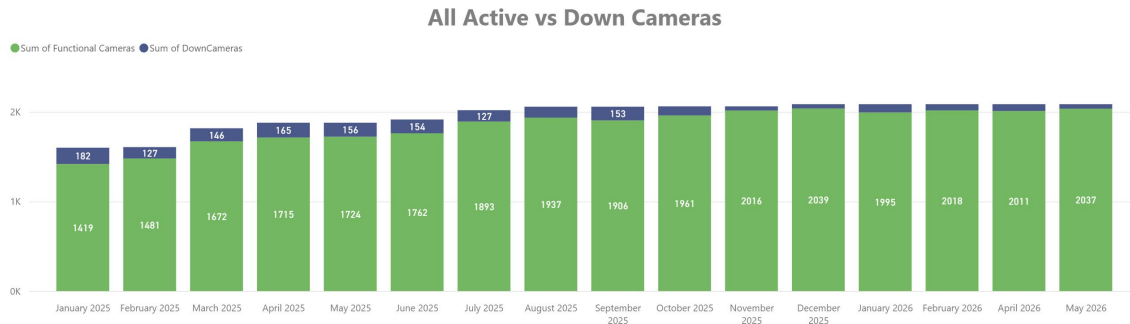
With respect to Recommendation 7, in 2024 and 2025 at the Sites and throughout its public housing portfolio, DCHA conducted security assessments throughout 2024 and 2025 in coordination with OPS and MPD. Camera placements, upgrades, and infrastructure improvements were implemented based on the recommendations and findings from those assessments.

As part of these efforts, DCHA completed extensive modernization projects during 2024 and 2025 to replace aging camera infrastructure, standardize camera platforms, improve centralized monitoring capabilities, and increase overall system reliability across the agency's portfolio.

---

<sup>5</sup> For further information, see for example Guardian Integrated Security. [\*“PTZ vs Fixed Camera: 5 Proven Comparison Tips.”\*](#)

DCHA has established a target operational uptime KPI of at least 95% across the agency’s camera network. Commercial surveillance environments commonly recognize that a small percentage of cameras may be temporarily offline at any given time due to maintenance, replacement cycles, vandalism, infrastructure issues, or equipment upgrades. Through modernization and maintenance initiatives completed during 2024 and 2025, DCHA reduced non-operational cameras from approximately 30% agency-wide to under 5% system-wide, exceeding the agency’s operational uptime target.



As of May 2026, approximately 50 of DCHA’s 2,087 cameras were non-operational, representing roughly 3% of the agency’s total camera inventory. DCHA believes this reflects a significant improvement in system reliability and operational performance across the agency’s security infrastructure – a testament to not only the strength of DCHA’s strong security assessments, but also the camera selection, implementation, and ongoing oversight that has resulted from that endeavor.

DCHA currently maintains an inventory of cameras by property location, operational status, and coverage area in order to ensure that appropriate security monitoring is maintained throughout the agency’s portfolio.

Due to frequent repairs, replacements, upgrades, vandalism incidents, and ongoing modernization efforts, camera components are routinely replaced or reconfigured throughout the lifecycle of the system. Given the size and complexity of DCHA’s camera network — which currently exceeds 2,500 cameras and continues to expand — maintaining and continuously validating installation-date records for every individual camera would require significant administrative resources. As such, we respectfully disagree with the recommendation to maintain date of camera installation as part of the record keeping. However, we believe the current system for overseeing and maintaining the security cameras is proving to be effective and effectively achieves the Draft Report’s recommendation.

DCHA’s operational priority is maintaining accurate information regarding camera locations, coverage areas, operational functionality, and maintenance status to ensure continued security coverage at all properties. DCHA believes these operational data points provide the greatest value for supporting security operations, maintenance response, and public safety objectives.

DCHA will continue evaluating opportunities to enhance inventory management practices in a manner that balances operational value, administrative feasibility, and available agency resources.

## CONCLUSION

The security and safety of DCHA's public housing communities, including the Sites, is of paramount importance to DCHA. We appreciate the DC Auditor's recommendations for improvements to the same. As indicated above, DCHA agrees with nearly all of the recommendations and, indeed, had implemented or already begun implementing the majority of them.

Please feel free to contact DCHA's General Counsel, Amy Glassman, at 202-451-9592 or [aglassman@dchousing.org](mailto:aglassman@dchousing.org) if you have questions regarding this response.

Sincerely,



Nicole Wickliffe  
Interim Executive Director

Attachments

# Attachment 1

## Yardi IMS/PIC Cleanup SOP



## District of Columbia Housing Authority

300 7th Street, SW | 10th Floor  
Washington, DC 20024  
(202) 535-1000 | [dchousing.org](http://dchousing.org)

---

### District of Columbia Housing Authority

Policy and Procedure: Public Housing Data Cleanup and Redundancy Resolution in Yardi and HUD IMS/PIC

#### 1. Policy Statement

The District of Columbia Housing Authority (“DCHA”) shall maintain accurate, complete, and consistent resident, unit, occupancy, and program data within the Authority’s property management system and federal reporting systems, including Yardi Voyager and HUD’s IMS/PIC. When duplicate, inconsistent, obsolete, or redundant records are identified, DCHA shall follow a standardized process to:

- Identify the source of the redundancy;
- Assign responsibility for data cleanup;
- Correct inaccurate records timely;
- Maintain audit documentation; and
- Prevent recurrence through quality assurance and oversight.

This policy establishes accountability for data cleanup activities and ensures compliance with U.S. Department of Housing and Urban Development (HUD) reporting requirements.

#### 2. Purpose

The purpose of this policy is to:

- Ensure accurate occupancy and resident records;
- Prevent reporting inconsistencies between Yardi and IMS/PIC;
- Establish clear ownership of data correction responsibilities;
- Reduce duplicate records and data entry errors;
- Improve data integrity and operational efficiency; and
- Support HUD compliance and reporting accuracy.

DCHA is committed to providing equal access to this event for all participants & residents with disabilities. If you need a reasonable accommodation, please contact our ADA/504 Department at [ADA504@dchousing.org](mailto:ADA504@dchousing.org) with your complete request. If you need a sign language or foreign language interpreter, please go to [dchousing.org/language](http://dchousing.org/language) or call 202-535-1000. Please allow at least 3 business days to make the necessary arrangements.

### **3. Scope**

This policy applies to:

- Public Housing operations staff;
- Property management staff;
- Admissions and occupancy staff;
- Asset management staff;
- Information technology staff;
- Compliance and quality assurance staff; and
- Any contractor or vendor responsible for entering or maintaining housing data.

The policy applies to all public housing records maintained in:

- Yardi Voyager;
- HUD IMS/PIC; and
- Associated interfaces, uploads, and reporting systems.

### **4. Definitions**

#### **4.1 Data Redundancy**

Duplicate, conflicting, obsolete, or repetitive information existing within or between systems that may result in inaccurate reporting or operational errors.

Examples include:

- Duplicate resident profiles;
- Duplicate household members;
- Multiple tenant IDs for one resident;
- Duplicate unit records;
- Conflicting move-in or move-out dates;
- Mismatched occupancy status between Yardi and IMS/PIC; and
- Duplicate certifications or transactions.

#### **4.2 Data Cleanup**

The process of reviewing, correcting, consolidating, or deleting inaccurate or duplicate records.

#### **4.3 System of Record**

The official source system designated by DCHA for maintaining original transactional data.

- Yardi shall serve as the primary operational system of record.



## District of Columbia Housing Authority

300 7th Street, SW | 10th Floor  
Washington, DC 20024  
(202) 535-1000 | dchousing.org

---

- IMS/PIC shall serve as the federal reporting system.

### 5. Roles and Responsibilities

#### 5.1 Property Management Staff

Housing Managers and/or Area Managers shall:

- Identify discrepancies during routine operations;
- Notify Eligibility, Continued Occupancy and Compliance staff of suspected redundancies;
- Provide supporting documentation; and
- Verify corrections affecting occupancy or resident status.

Examples:

- Duplicate household records;
- Incorrect unit assignments; and
- Improper move-in/move-out dates.

#### 5.2 Eligibility and Continued Occupancy Staff

Eligibility and Continued Occupancy staff shall:

- Review tenant file documentation;
- Validate resident demographics and occupancy information;
- Correct resident and household data in Yard;
- Coordinate required corrections transmitted to IMS/PIC; and
- Maintain documentation of all changes.

Recertification staff are primarily responsible for:

- Household composition corrections;
- Certification/recertification, including correcting discrepancies;
- Tenant status corrections; and
- Duplicate resident resolution.

DCHA is committed to providing equal access to this event for all participants & residents with disabilities. If you need a reasonable accommodation, please contact our ADA/504 Department at [ADA504@dchousing.org](mailto:ADA504@dchousing.org) with your complete request. If you need a sign language or foreign language interpreter, please go to [dchousing.org/language](http://dchousing.org/language) or call 202-535-1000. Please allow at least 3 business days to make the necessary arrangements.

### 5.3 Compliance and Quality Control (QC)

The Compliance/QC team shall:

- Monitor system-wide data quality;
- Conduct periodic data integrity audits;
- Identify recurring redundancy trends;
- Assign corrective actions;
- Validate completion of cleanup activities; and
- Maintain audit logs and corrective action reports.

The QC team shall serve as the lead oversight entity for all data cleanup initiatives.

### 5.4 Information Technology Division (ITD)

ITD shall:

- Assist with system-level corrections;
- Address interface or synchronization issues;
- Support database integrity reviews;
- Restrict unauthorized deletion or modification privileges; and
- Maintain system backups and audit trails.

ITD shall not modify occupancy or resident records without written authorization from PMO leadership (SVP/VPs).

### 5.5 Compliance/QC Lead

Compliance/QC Lead shall:

- Review system-generated errors;
- Coordinate batch corrections when appropriate;
- Monitor failed transmissions to IMS/PIC;
- Ensure correction workflows are completed; and
- Retain system audit history.

### 5.6 PMO Senior Team (SVP/VPs)

PMO Senior Team shall:

- Ensure staff compliance with this policy;
- Monitor timely completion of corrective actions;
- Escalate unresolved discrepancies to ITD or HUD, when necessary; and



## District of Columbia Housing Authority

300 7th Street, SW | 10th Floor  
Washington, DC 20024  
(202) 535-1000 | [dchousing.org](http://dchousing.org)

---

- Implement staff retraining when necessary.

### 6. Procedures for Data Cleanup and Redundancy Resolution

#### Step 1 – Identification of Redundancy

Data redundancies may be identified through:

- Routine staff review;
- HUD error reports;
- PIC reconciliation reports;
- Yardi validation reports;
- Internal audits;
- Resident complaints;
- Management reviews; and
- QA monitoring activities.

The discovering employee shall document:

- Record type affected;
- Nature of discrepancy;
- System(s) impacted;
- Date identified; and
- Supporting evidence.

#### Step 2 – Submission of Data Cleanup Request

The discovering staff member shall submit a Data Cleanup Request to:

- VP for Eligibility, Continued Occupancy and Compliance; and
- Compliance/QC Team Lead.

The request shall include:

- Resident name, t-code or unit code/address;
- Description of issue;
- Screenshots or reports;

DCHA is committed to providing equal access to this event for all participants & residents with disabilities. If you need a reasonable accommodation, please contact our ADA/504 Department at [ADA504@dchousing.org](mailto:ADA504@dchousing.org) with your complete request. If you need a sign language or foreign language interpreter, please go to [dchousing.org/language](http://dchousing.org/language) or call 202-535-1000. Please allow at least 3 business days to make the necessary arrangements.

- Recommended correction; and
- Potential HUD impact.

### Step 3 – Preliminary Review and Assignment

Within five (5) business days, the Compliance/QA Team Lead shall:

- Review the discrepancy;
- Determine severity and compliance impact; and
- Assign to responsible staff.

### Step 4 – Investigation and Verification

Responsible staff shall:

- Review source documentation;
- Verify tenant file information;
- Compare Yardi and IMS/PIC records;
- Determine the correct data set; and
- Identify root cause.

If records cannot be verified, management review shall be required before changes are made.

### Step 5 – Data Correction

Authorized staff shall:

- Correct records in Yardi;
- Process required certifications or transactions;
- Resubmit corrected records to IMS/PIC if applicable;
- Remove duplicate or obsolete records when permitted; and
- Document all actions taken.

No record deletion shall occur without:

- Supervisory approval; and
- Documentation retained in the audit file.

### Step 6 – Quality Control Validation

After corrections are completed, the VP for Eligibility, Continued Occupancy and Compliance shall:

- Complete a random selection of 10% of all action types completed each month;
- Verify that discrepancies were resolved;



## District of Columbia Housing Authority

300 7th Street, SW | 10th Floor  
Washington, DC 20024  
(202) 535-1000 | [dchousing.org](http://dchousing.org)

---

- Confirm synchronization between systems;
- Validate HUD reporting accuracy; and
- Review audit trail documentation.

QA validation shall occur within seven (7) business days of correction completion.

### Step 7 – Closure and Documentation

The cleanup request shall not be closed until:

- All corrections are verified;
- Supporting documentation is retained; and
- QC approval is completed.

Records shall be maintained electronically for a minimum of three (3) years or longer if required by HUD retention standards.

### 7. Escalation Procedures

The following issues shall be escalated immediately to PMO Senior Leadership Team (SVP/VPs):

- Systemic duplicate record trends;
- Repeated staff data entry errors;
- HUD reporting failures;
- Unresolved discrepancies older than 30 days;
- Potential fraud or intentional manipulation; and
- System interface failures affecting multiple properties.

### 8. Internal Controls

DCHA shall implement the following controls:

- Segregation of duties for data entry and approval;
- Periodic reconciliation between Yardi and IMS/PIC;
- Audit trail monitoring;
- Restricted deletion permissions;
- Quarterly data quality audits; and

DCHA is committed to providing equal access to this event for all participants & residents with disabilities. If you need a reasonable accommodation, please contact our ADA/504 Department at [ADA504@dchousing.org](mailto:ADA504@dchousing.org) with your complete request. If you need a sign language or foreign language interpreter, please go to [dchousing.org/language](http://dchousing.org/language) or call 202-535-1000. Please allow at least 3 business days to make the necessary arrangements.

- Mandatory supervisory review of high-risk corrections.

## **9. Training Requirements**

All applicable staff shall receive annual training regarding:

- Data integrity standards;
- HUD reporting requirements;
- Yardi data entry procedures;
- Duplicate record prevention;
- Cleanup and correction procedures; and
- Documentation standards.

New employees shall complete training prior to receiving system access.

## **10. Compliance Monitoring**

The Compliance/QC Team shall:

- Conduct quarterly audits;
- Track correction trends;
- Issue corrective action recommendations; and
- Report significant findings to PMO Senior Leadership Team (SVP/VP)

Repeat deficiencies may result in:

- Retraining;
- Performance management action; and/or
- Revocation of system access.

## **11. Record Retention**

All documentation related to data cleanup activities shall be retained in accordance with:

- HUD record retention requirements;
- DCHA records management policies; and
- Applicable federal and local regulations.

Documentation shall include:

- Cleanup requests;
- Audit findings;
- Correction approvals;
- Screenshots;



## District of Columbia Housing Authority

300 7th Street, SW | 10th Floor

Washington, DC 20024

(202) 535-1000 | [dchousing.org](http://dchousing.org)

---

- Reports;
- Correspondence; and
- Validation results.

DCHA is committed to providing equal access to this event for all participants & residents with disabilities. If you need a reasonable accommodation, please contact our ADA/504 Department at [ADA504@dchousing.org](mailto:ADA504@dchousing.org) with your complete request. If you need a sign language or foreign language interpreter, please go to [dchousing.org/language](http://dchousing.org/language) or call 202-535-1000. Please allow at least 3 business days to make the necessary arrangements.

# Attachment 2

## Work Order Procedure



## District of Columbia Housing Authority

300 7th Street, SW | 10th Floor  
Washington, DC 20024  
(202) 535-1000 | [dchousing.org](http://dchousing.org)

---

**Policy Title:** Timely Repair Response and Work Order Closure in Low Rent Public Housing

**Purpose:** Ensure all repair requests in public housing units or common areas are addressed promptly and efficiently to maintain safe, livable conditions.

**Scope:** This policy applies to all DC Housing Authority Low Rent Public Housing (LRPH) Sites

**Policy:** All repair requests must be categorized by severity (e.g., emergency, urgent, routine).

- **Emergency workorders (e.g., loss of heat, non-working toilet when only one toilet is present in the unit, flooding, entry door to residential building<sup>1</sup>):** the established timeframe for completion of repairs/abatement or relocation (temporary or permanent based on specific unit repairs) is within 24 hours from the time reported.
- **Urgent workorders (e.g., exterior lighting, broken doors or plumbing leaks):** the established timeframe for completion of repairs/abatement is within 72-hours from the time reported.
- **Routine workorders (such as cosmetic issues):** the established timeframe for completion of repairs/abatement is within 21-days from the time reported.

**Procedure:** Workorders are listed in Yardi with a priority level. The assigned maintenance team must begin work within the timeframe based on the priority. After the repair is completed, the maintenance staff must update the work order with a detailed description of the repairs, date of completion, and any follow-up steps. Foreman or in some cases a Regional Maintenance Supervisor (RMS) must review the completed work order, confirming the issue is fully resolved. Once approved, the work order can be officially closed out in the system. All work orders and timelines must be documented, and monthly reports on repair turnaround times are reported within PMO's month-end report to the OED.

---

<sup>1</sup> Entry doors to residential building is included as an emergency workorder at 10 specific LRPH sites in response to the 2020 OAG Consent Order.

DCHA is committed to providing equal access to this event for all participants & residents with disabilities. If you need a reasonable accommodation, please contact our ADA/504 Department at [ADA504@dchousing.org](mailto:ADA504@dchousing.org) with your complete request. If you need a sign language or foreign language interpreter, please go to [dchousing.org/language](http://dchousing.org/language) or call 202-535-1000. Please allow at least 3 business days to make the necessary arrangements.

# Attachment 3

## Vacant Unit Guidance

**From:** [Lashaunda N. Perry](#)  
**To:** [Brian McBride](#)  
**Subject:** Reinforcement of Vacancy Walk Requirements – February Compliance  
**Attachments:** [PMO Housing Manager and Area Manager Unit Certification Form 2.2026.docx](#)  
[POTOMAC VACANCY as 1.17.xlsx](#)  
**Importance:** High

---

Brian, please find the information and document requirements to discuss the vacancy requirements. I will do a quick overview with the Area Managers of the below requirements and this email. However, I would like the below email sent to all Area Managers and Housing Managers, please request a delivery and read receipt. The Potomac vacancy has been attached of an example of what should be submitted in PDF format.

Team,

This communication serves to formally reinforce the vacancy walk requirements and reporting expectations previously established by SVP Nona Eath on January 13, 2024. These procedures remain in full effect and are not optional.

Consistent execution and timely reporting are critical to our occupancy goals, compliance posture, and overall portfolio performance.

The required process is as follows:

1. Scheduling: All vacant unit inspections must be scheduled no later than the 5th of each month.
2. Completion of Walks: All vacant units must be physically inspected no later than the 28th of each month.
3. Certification: The inspection certification form must be completed and submitted within two (2) business days following the completion of inspections. Certifications must include both the Housing Manager and Area Manager signatures.
4. Supporting Documentation: The certification submission must include the vacant unit listing used to schedule and conduct the inspections.

For the month of February, the following additional directives apply:

- All vacant unit inspections must be completed and entered into Yardi.
- All inspections must be fully certified in Yardi no later than February 28, 2026.
- The finalized certification package for each property must be submitted to Brian McBride on March 1, 2026.

Area Managers are responsible for ensuring full compliance at their respective sites. Housing Managers are responsible for execution and documentation accuracy. Failure to meet these timelines will be addressed accordingly.

We are driving toward improved vacancy management, stronger internal controls, and a disciplined operational culture.

Thank you in advance for your immediate attention and accountability. Please reach out if clarification is needed.

**Shaun Perry**

Vice President of Operations

Office of Property Management Operations

**District of Columbia Housing Authority**

e: [lperry@dchousing.org](mailto:lperry@dchousing.org)

m: (202) 361-5383

---

[www.dchousing.org](http://www.dchousing.org)

---



## Housing Manager and Area Manager Vacant Unit Monthly Certification

Each month the Housing Manager is required to walk vacant units and upload pictures to YARDI based on email instructions as part of the management operations of the property. The monthly inspections must be scheduled no later than **the 5<sup>th</sup> of the month** and schedule inspections and pictures must be completed and uploaded by the **28<sup>th</sup> of each month**.

The Manager will be required to provide the vacant unit list used to create the inspections and inspect units. \*The LIPH Vacant Unit list, downloaded to excel, and remove the occupied and notice units to reflect all other units (Down, Excluded, and Vacant)

Property Name: \_\_\_\_\_ Inspection Month and Year: \_\_\_\_\_

# of Vacant Units: \_\_\_\_\_

# of Units Not Inspected: \_\_\_\_\_

# of Units with photos attached: \_\_\_\_\_

# Reasons why units not inspected: \_\_\_\_\_

List staff who Inspected units: \_\_\_\_\_

\_\_\_\_\_

Housing Manager Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Area Manager Signature: \_\_\_\_\_ Date: \_\_\_\_\_







LIPH Property Unit HUD PHA Status Report

Property=ph043

Property	Name	Unit Code	Full Address	Voyager Unit Status	Bedrooms	PHA HUD Status
ph043	Potomac Gardens-AMP 4430	043-0326	1229 G ST SE^602^WASHINGTON, DC 20003	Notice Unrented	0	Occupied
ph043	Potomac Gardens-AMP 4430	043-0327	1229 G ST SE^603^WASHINGTON, DC 20003	Occupied No Notice	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0328	1229 G ST SE^604^WASHINGTON, DC 20003	Vacant Unrented Not Ready	1	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0329	1229 G ST SE^605^WASHINGTON, DC 20003	Vacant Unrented Ready	1	Vacant - Lease Up
ph043	Potomac Gardens-AMP 4430	043-0330	1229 G ST SE^606^WASHINGTON, DC 20003	Vacant Unrented Not Ready	1	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0331	1229 G ST SE^607^WASHINGTON, DC 20003	Occupied No Notice	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0332	1229 G ST SE^608^WASHINGTON, DC 20003	Occupied No Notice	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0333	1229 G ST SE^609^WASHINGTON, DC 20003	Occupied No Notice	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0334	1229 G ST SE^610^WASHINGTON, DC 20003	Occupied No Notice	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0335	1229 G ST SE^611^WASHINGTON, DC 20003	Occupied No Notice	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0336	1229 G ST SE^612^WASHINGTON, DC 20003	Notice Unrented	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0337	1229 G ST SE^613^WASHINGTON, DC 20003	Occupied No Notice	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0338	1229 G ST SE^614^WASHINGTON, DC 20003	Vacant Unrented Not Ready	0	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0339	1229 G ST SE^615^WASHINGTON, DC 20003	Notice Unrented	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0340	1229 G ST SE^616^WASHINGTON, DC 20003	Occupied No Notice	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0341	1229 G ST SE^617^WASHINGTON, DC 20003	Occupied No Notice	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0342	1229 G ST SE^618^WASHINGTON, DC 20003	Occupied No Notice	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0343	1229 G ST SE^619^WASHINGTON, DC 20003	Occupied No Notice	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0344	1229 G ST SE^620^WASHINGTON, DC 20003	Vacant Unrented Ready	1	Vacant - Lease Up
ph043	Potomac Gardens-AMP 4430	043-0345	1229 G ST SE^621^WASHINGTON, DC 20003	Occupied No Notice	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0346	1229 G ST SE^622^WASHINGTON, DC 20003	Vacant Unrented Not Ready	0	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0347	1229 G ST SE^623^WASHINGTON, DC 20003	Vacant Unrented Ready	1	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0348	1229 G ST SE^624^WASHINGTON, DC 20003	Notice Unrented	1	Occupied
ph043	Potomac Gardens-AMP 4430	043-0349	1229 G ST SE^625^WASHINGTON, DC 20003	Vacant Unrented Not Ready	1	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0350	1229 G ST SE^626^WASHINGTON, DC 20003	Vacant Unrented Not Ready	1	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0351	1229 G ST SE^627^WASHINGTON, DC 20003	Vacant Unrented Not Ready	1	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0352	1229 G ST SE^628^WASHINGTON, DC 20003	Occupied No Notice	1	Occupied

SAMPLE



### LIPH Property Unit HUD PHA Status Report

Property=ph043

Property	Name	Unit Code	Full Address	Voyager Unit Status	Bedrooms	PHA HUD Status
ph043	Potomac Gardens-AMP 4430	043-0167	1224 I ST SE^11^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0168	1224 I ST SE^12^WASHINGTON, DC 20003	Vacant Unrented Ready	3	Vacant - Lease Up
ph043	Potomac Gardens-AMP 4430	043-0169	1224 I ST SE^21^WASHINGTON, DC 20003	Vacant Unrented Ready	3	Vacant - Lease Up
ph043	Potomac Gardens-AMP 4430	043-0170	1224 I ST SE^22^WASHINGTON, DC 20003	Excluded	3	Vacant - Lease Up
ph043	Potomac Gardens-AMP 4430	043-0171	1224 I ST SE^31^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0172	1224 I ST SE^32^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0065	704 12TH ST SE^11^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0066	704 12TH ST SE^12^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0067	704 12TH ST SE^21^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0068	704 12TH ST SE^22^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0069	704 12TH ST SE^31^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0070	704 12TH ST SE^32^WASHINGTON, DC 20003	Vacant Unrented Not Ready	3	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0071	706 12TH ST SE^11^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0072	706 12TH ST SE^12^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0073	706 12TH ST SE^21^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0074	706 12TH ST SE^22^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0075	706 12TH ST SE^31^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0076	706 12TH ST SE^32^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0077	708 12TH ST SE^11^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0078	708 12TH ST SE^12^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0079	708 12TH ST SE^21^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0080	708 12TH ST SE^22^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0081	708 12TH ST SE^31^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0082	708 12TH ST SE^32^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0083	710 12TH ST SE^11^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0084	710 12TH ST SE^12^WASHINGTON, DC 20003	Vacant Unrented Not Ready	3	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0085	710 12TH ST SE^21^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0086	710 12TH ST SE^22^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0087	710 12TH ST SE^31^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0088	710 12TH ST SE^32^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0089	712 12TH ST SE^11^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0090	712 12TH ST SE^12^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0091	712 12TH ST SE^21^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0092	712 12TH ST SE^22^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0093	712 12TH ST SE^31^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0094	712 12TH ST SE^32^WASHINGTON, DC 20003	Vacant Unrented Not Ready	3	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0173	713 13TH ST SE^11^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0174	713 13TH ST SE^12^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0175	713 13TH ST SE^21^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0176	713 13TH ST SE^22^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0177	713 13TH ST SE^31^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0178	713 13TH ST SE^32^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0095	714 12TH ST SE^11^WASHINGTON, DC 20003	Excluded	3	Non Dwelling
ph043	Potomac Gardens-AMP 4430	043-0096	714 12TH ST SE^12^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0097	714 12TH ST SE^21^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0098	714 12TH ST SE^22^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0099	714 12TH ST SE^31^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0100	714 12TH ST SE^32^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0179	715 13TH ST SE^11^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0180	715 13TH ST SE^12^WASHINGTON, DC 20003	Vacant Unrented Not Ready	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0181	715 13TH ST SE^21^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0182	715 13TH ST SE^22^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0183	715 13TH ST SE^31^WASHINGTON, DC 20003	Vacant Unrented Not Ready	3	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0184	715 13TH ST SE^32^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0101	716 12TH ST SE^11^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0102	716 12TH ST SE^12^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0103	716 12TH ST SE^21^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0104	716 12TH ST SE^22^WASHINGTON, DC 20003	Vacant Unrented Not Ready	3	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0105	716 12TH ST SE^31^WASHINGTON, DC 20003	Notice Unrented	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0106	716 12TH ST SE^32^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization

SAMPLE

**LIPH Property Unit HUD PHA Status Report**

Property=ph043

Property	Name	Unit Code	Full Address	Voyager Unit Status	Bedrooms	PHA HUD Status
ph043	Potomac Gardens-AMP 4430	043-0185	717 13TH ST SE^11^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0186	717 13TH ST SE^12^WASHINGTON, DC 20003	Vacant Unrented Not Ready	3	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0187	717 13TH ST SE^21^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0188	717 13TH ST SE^22^WASHINGTON, DC 20003	Excluded	0	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0189	717 13TH ST SE^31^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0190	717 13TH ST SE^32^WASHINGTON, DC 20003	Vacant Unrented Ready	3	Vacant - Lease Up
ph043	Potomac Gardens-AMP 4430	043-0191	719 13TH ST SE^11^WASHINGTON, DC 20003	Occupied No Notice	3	Vacant - Lease Up
ph043	Potomac Gardens-AMP 4430	043-0192	719 13TH ST SE^12^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0193	719 13TH ST SE^21^WASHINGTON, DC 20003	Vacant Unrented Ready	3	Vacant - Lease Up
ph043	Potomac Gardens-AMP 4430	043-0194	719 13TH ST SE^22^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0195	719 13TH ST SE^31^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0196	719 13TH ST SE^32^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0197	721 13TH ST SE^11^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0198	721 13TH ST SE^12^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0199	721 13TH ST SE^21^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0200	721 13TH ST SE^22^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0201	721 13TH ST SE^31^WASHINGTON, DC 20003	Vacant Unrented Not Ready	3	Vacant - Down
ph043	Potomac Gardens-AMP 4430	043-0202	721 13TH ST SE^32^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0203	723 13TH ST SE^11^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0204	723 13TH ST SE^12^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0205	723 13TH ST SE^21^WASHINGTON, DC 20003	Excluded	3	Undergoing Modernization
ph043	Potomac Gardens-AMP 4430	043-0206	723 13TH ST SE^22^WASHINGTON, DC 20003	Notice Unrented	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0207	723 13TH ST SE^31^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied
ph043	Potomac Gardens-AMP 4430	043-0208	723 13TH ST SE^32^WASHINGTON, DC 20003	Occupied No Notice	3	Occupied

**SAMPLE**

**From:** [Lashaunda N. Perry](#)  
**Cc:** [Rhonda Harvell](#); [Semadra Watson](#); [Emiko Brown](#); [Tammy E. Rogers](#); [Shavon Davis](#); [Nicole Wickliffe](#)  
**Subject:** Immediate Action Required – Addressing Resident Concerns & Strengthening Accountability  
**Importance:** High

---

Dear PMO team,

As we continue working to shift the culture of DCHA and enhance our service to residents, I want to thank those of you who have remained dedicated to our mission—providing safe, decent, and affordable housing with the highest standard of customer service. However, concerns raised during the recent *Block by Block* initiative hosted by Commissioner Blackson highlight critical areas requiring immediate improvement. Our residents deserve timely, effective, and professional service. As leaders in property management, it is our duty to enforce policies, follow procedures, and ensure that every resident experiences fair and equitable treatment. Below are key issues raised that must be addressed immediately:

#### **Policy Enforcement & Resident Services**

- **Pet Policy Compliance:** Management must enforce DCHA’s pet policy, including ensuring that owners properly clean up after their animals and follow leash laws. Service animal accommodations do not exempt residents from their responsibility to maintain a clean environment.
- **Rent & Recertification Transparency:** Residents must receive clear and thorough explanations regarding their rent calculations, and all required documents must be processed in a timely manner. No resident should feel forced into a determination without understanding their options.

#### **Property Management & Maintenance Standards**

- **Emergency Maintenance Response:** All emergencies—including rodent removal—must be addressed **within 24 hours**, with a follow-up call to ensure proper resolution. Delays in emergency services are unacceptable.
- **Curb Appeal & Property Cleanliness:** Grounds, buildings, and common areas must be well-maintained. A clean, well-kept property directly impacts resident satisfaction and overall community perception.
- **Daily Property Inspections:** Management teams **must** conduct and document daily property inspections, promptly addressing deficiencies. A lack of oversight leads to deteriorating conditions, which we are working diligence to resolve in conjunction with CCD.
- **Office Accessibility & Resident Service Hours:** Offices must remain open from **8:15 AM to 4:45 PM** without closure for lunch or non-approved reasons. There must always be staff available to assist residents.
- **Vacant Unit Security & Unauthorized Occupancy:** All vacant units must be **secured**. Unauthorized tenants or contractors residing in units is a serious violation of DCHA policy and should not be tolerated.

## **Operational Improvements & Resident Safety**

- **Laundry Facilities:** Non-functioning washers and dryers create frustration and hardship for residents. Ensure all machines are in working order, and report issues promptly.
- **Resident Safety & Security:** When residents bring safety concerns to management, **follow-up and follow-through are non-negotiable.** Ignoring or delaying responses puts our residents at risk and undermines their trust in our leadership.

## **Accountability & Leadership Expectations**

DCHA's **mission** is to serve our residents with dignity and fairness. We are not just managing properties—we are responsible for the well-being of families who rely on us for housing. Leadership at every level must step up to ensure that **policies are enforced, problems are resolved, and residents receive the service they deserve.**

I expect **immediate corrective action** in these areas. Each housing manager is responsible for leading their team in a manner that reflects professionalism, accountability, and commitment to our mission. **We are here to make a difference—not maintain the status quo.**

I will be following up with each team to ensure measurable progress is being made. Let's take ownership, drive change, and set a new standard for public housing management in D.C.

Best,

Shaun Perry

**Vice President of Property Management Operations**

Office of Property Management Operations

**District of Columbia Housing Authority**

e: [lnperry@dchousing.org](mailto:lnperry@dchousing.org)

m: (202) 361-5383

---

[www.dchousing.org](http://www.dchousing.org)

**From:** [Lashaunda N. Perry](#)  
**To:** [Donte Cotten](#); [Semadra Watson](#); [Tyree Riley](#); [Rhonda Harvell](#)  
**Cc:** [Shavon Davis](#); [Brian McBride](#)  
**Subject:** FW: Perishable Items in Vacant Units  
**Attachments:** [image001.png](#)  
**Importance:** High

---

Good afternoon, Team,

This is a friendly reminder regarding our expectations for managing vacant units to support timely turnover and maintain property standards.

All onsite management teams are expected to:

- Walk vacant units within 24–72 hours of move-out to complete the move-out inspection
- Finalize inspections in Maintenance IQ, including uploading all required photos
- Enter a work order immediately upon vacancy to notify Maintenance of:
  - Trash-out needs
  - Perishable items
  - Any conditions that may lead to pest and/or rodent activity

These steps are essential to ensuring we maintain clean, safe, and move-in ready units while minimizing preventable issues across the portfolio.

We appreciate your follow through and partnership with Shavon and the Maintenance team to execute this efficiently. Let's remain consistent and proactive in our approach.

Please ensure your teams are aligned. Reach out if you need any support. Thank you,

**Shaun Perry**

Vice President of Operations

Office of Property Management Operations

**District of Columbia Housing Authority**

e: [lnperry@dchousing.org](mailto:lnperry@dchousing.org)

m: (202) 361-5383

---

[www.dchousing.org](http://www.dchousing.org)

# Attachment 4

## Area Manager/Housing Manager Transition List



## District of Columbia Housing Authority

300 7th Street, SW | 10th Floor  
Washington, DC 20024  
(202) 535-1000 | dchousing.org

### Area Manager/Housing Manager Transition Playbook

Purpose: Ensure a smooth, well-documented handoff so the incoming Area Manager and/or Housing Manager is fully aware of property operations, internal and external stakeholders, risks, and near-term priorities.

Portfolio/Region	Outgoing AM/PM	Incoming AM/PM	Handover Date
[Portfolio/Region]	[Outgoing Name]	[Incoming Name]	[Handover Date]

#### Name of LIPH Site (For HM Transition Only)

Handover Checklist (What to Prepare)

#### 1) Portfolio Snapshot

- Property list/Site (ACC, occupied, vacant, down/offline)
- Key contacts: AM/HM, Regional Foreman, Resident Council, security
- Operating hours, site access instructions, emergency procedures
- Service Providers and services offered at the site

#### 2) KPIs & Trends

- Occupancy, lease-ups, offer acceptance
- List of offline units
- Rent billed/collected, delinquency aging
- WO backlog, WO>30 days, EM response
- NSPIRE Status, DOB/code infractions Status
- Current Hotel placements
- Open grievances and timelines

#### 3) People & Staffing

- Staff roster; vacancies and coverage; leave schedules
- Performance notes/PIPs

#### 4) Compliance & Legal

- Upcoming recerts and Deadlines
- Open grievances/hearings, legal actions
- Site policies (any property specific-need to know information such as access controls, meetings)

DCHA is committed to providing equal access to this event for all participants & residents with disabilities. If you need a reasonable accommodation, please contact our ADA/504 Department at [ADA504@dchousing.org](mailto:ADA504@dchousing.org) with your complete request. If you need a sign language or foreign language interpreter, please go to [dchousing.org/language](http://dchousing.org/language) or call 202-535-1000. Please allow at least 3 business days to make the necessary arrangements.

5) Maintenance & Projects

- Turn pipeline
- Open capital/special projects

6) Risk & Continuity

- Safety issues, repeat failures (e.g., leaks/mold)
- Continuity plans (weather/outages/relocation)

7) Systems & Access

- Yardi roles, Maintenance IQ, shared drives, email groups
- Key control, fob, cameras (as applicable)
- Reporting cadence templates & DLs

8) Communications

- Resident Council: who and any pending concerns

# ODCA Response to Agency Comments

---

We appreciate DCHA's responses to the draft report and are pleased with DCHA's concurrence with all eight of our recommendations and that it has made progress toward their implementation. We also appreciate DCHA providing the standard operating procedures related to data cleanup, work order procedures, vacant unit guidance, and the area and housing manager transition document. DCHA's concurrence and the attachments provided with its response highlight its commitment towards increasing public safety at DCHA properties and enhancing consistency and operational stability within DCHA. We thank DCHA for its efforts.

# Appendices

# **Appendix A**

Consent Judgment and Order (No. 2020 CA 002740 B)

**IN THE SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
CIVIL DIVISION**

**DISTRICT OF COLUMBIA,**

*Plaintiff,*

v.

**DISTRICT OF COLUMBIA HOUSING  
AUTHORITY,**

*Defendant.*

Civ. No. 2020 CA 002740 B

Judge Fern Flanagan Saddler

---

**CONSENT JUDGMENT AND ORDER**

This **CONSENT JUDGMENT AND ORDER** (“Consent Order”) is made this **10th** day of **September, 2020**, by and between Plaintiff District of Columbia, through the Office of the Attorney General (the “District” or “OAG”), and Defendant District of Columbia Housing Authority (“DCHA”), to address the drug- and firearm-related nuisance activity at ten (10) public housing properties:

**WHEREAS** this case concerns the following public housing complexes (each, a “Property”; collectively “Properties”):

Carroll Apartments  
Benning Terrace Apartments  
James Creek Apartments  
Kenilworth Courts Apartments<sup>1</sup>  
Langston Terrace and Additions  
LeDroit Apartments and Kelly Miller Apartments  
Lincoln Heights Apartments  
Richardson Dwellings Apartments  
Stoddert Terrace Apartments and  
Syphax Gardens Apartments.

See **Exhibit A** for full list of property addresses.

**WHEREAS**, District of Columbia Housing Authority is the owner of the Properties;

---

<sup>1</sup> Any property within Kenilworth Courts Apartments that is neither owned nor managed by DCHA shall not be a Property subject to this Consent Order.

**WHEREAS** on June 9, 2020, the District filed a Complaint (“Complaint”) for violations of the Drug-, Firearm-, or Prostitution-Related Nuisance Abatement Act, D.C. Code §§ 42-3101–42-3114, to compel DCHA to abate drug- and firearm-related nuisances at the Properties; and

**WHEREAS**, DCHA admits no wrongdoings as set forth in the Complaint; and

**WHEREAS**, the DCHA and OAG desire to resolve this matter in lieu of continuing litigation.

**NOW, THEREFORE**, based on the agreement of DCHA and the District in lieu of continuing litigation, the following is hereby **ORDERED**:

1. **JURISDICTION**. The parties agree that this Court has subject matter jurisdiction and personal jurisdiction in this action.
2. **SECURITY PLAN**. DCHA agrees to institute the following security plan at the Properties which shall be maintained and remain in place for as long as DCHA owns, operates, or manages the Properties for the term of this Consent Order:

(a) Exterior Lighting

- i. DCHA shall install and maintain exterior lighting fixtures in accordance with the deadlines in **Exhibit B**.
- ii. DCHA shall alter the location of lighting, upon mutual agreement of DCHA and the District, based on areas of criminal activity in the Properties. DCHA shall maintain branches and trees that are on the Properties, and around the lighting, to avoid obstructions.
- iii. Dumpsters will be moved to avoid visual obstruction of the lighting.
- iv. DCHA shall repair or replace any non-functioning exterior lighting within five (5) business days of notice of defective light fixtures.

(b) Security Cameras

- i. DCHA shall install and maintain a high-definition security camera system, in consultation with the Metropolitan Police Department (“MPD”) and in accordance with the locations and deadlines indicated in **Exhibit C**, to fully capture the exterior of the Property to avoid material visual obstruction.
- ii. Dumpsters will be moved to avoid visual obstruction of camera views.
- iii. DCHA shall provide electronic access to security cameras to MPD. Access to security camera footage also will be maintained at a central

location at current (1133 North Capitol Street, NE, Washington, DC 20002) or future DCHA headquarters, but available to MPD remotely.

- iv. DCHA shall provide to OAG and MPD the following information regarding all high-definition security cameras located on the Property: invoices, brand, serial number(s), and specific location(s) for each camera.
- v. DCHA shall cause non-operational cameras to be repaired and access to the footage shall be restored within five (5) business days.
- vi. Following the installation of exterior lighting and security cameras in accordance with this security plan, DCHA must repair and replace such exterior lighting and security cameras as needed with fixtures and equipment of equal or greater quality and capabilities, maintaining the same coverage as the locations in **Exhibit C**. DCHA shall have the opportunity to modify the placement of exterior lighting and cameras annually by agreement with the District.

(c) “No Trespassing” and “No Loitering” Signs

- i. Within five (5) business days of signing this Consent Order, DCHA shall install and maintain signs in the common areas (e.g. sidewalks, stairways into buildings, common land) at the Properties that read: “For Resident Use Only. No Trespassing or Loitering by Others”.
- ii. DCHA will maintain branches and trees around the signs to avoid obstructions. Any dumpsters and other obstructions will be moved to avoid visual obstruction of the signs.
- iii. DCHA shall enforce the signage requirements enumerated in Section 2(c)(i), through written notice to individuals (a copy to be maintained by DCHA) to prevent those who do not reside at the Properties, or those who are not with individuals who reside at the Properties, from remaining at the Properties.

(d) Abandoned Vehicles

- i. Within thirty (30) days of signing this Consent Order, DCHA will compile, and property managers will maintain, a list of vehicles that are owned by DCHA tenants and their guests to identify accurately which vehicles on the Properties are abandoned.
- ii. DCHA will ticket abandoned vehicles and within five (5) business days of identifying vehicles as not belonging to a tenant, guest, or other

occupant of the Properties will request an outside contractor to tow such vehicles.

- iii. On a weekly basis DCHA will inspect each Property for abandoned vehicles and cause abandoned vehicles to be ticketed and towed.

(e) Securing Entrances to Residential Buildings

- i. Upon identification or report of a malfunctioning door at the Properties, DCHA shall repair or replace the door and ensure functionality. This repair or replacement must take place within one (1) day if in-house supplies are available or within two (2) days if an outside contractor is required.
- ii. As part of the security camera installation provided in 2(b), DCHA shall use point and tilt zoom cameras near entrances of multifamily unit buildings. DCHA shall prioritize security patrols based on the data they retrieve from the security cameras.
- iii. If a Property has a security guard, the security guard shall require all guests entering the Property to sign into a visitor's log.

(f) Property Maintenance: DCHA shall perform regular maintenance of the grounds of each Property, including but not limited to pruning of overgrown vegetation, mowing the lawns, and trash collection twice per week. For Properties managed by Homeowners associations, DCHA shall include these requirements in the related management agreement.

(g) Vacant Units

- i. As of the date of this Consent Order, DCHA proposes to rehabilitate approximately 250 units on the 10 Properties during the second quarter of 2021. DCHA will provide an update to the District as to the vacancy and construction status of those units monthly by e-mail by to undersigned counsel or other designees seven (7) days before the beginning of each new month.
- ii. Within five (5) days of signing this Consent Order, DCHA will secure all vacant units with boards and lock boxes. Upon knowledge of a unit becoming vacant, unless otherwise not permitted by DC Code 42-3505.51, DCHA will secure the unit within seven (7) business days.
- iii. DCHA shall ensure that all vacant units in the Properties remain secured. DCHA's Public Safety Officers (including security guards, special police officers, and police officers) shall check the security of vacant units on each shift, utilizing a report sheet. *See Exhibit D* for

sample report sheet. During the meetings outlined in 2(i) below, DCHA shall include on the agenda the status of the vacant units on the applicable Properties. For purposes of clarity, nothing in this section shall preclude DCHA from re-entering any secured vacant units in order to provide for repairs in the vacant units that have damages that is negatively impacting adjacent occupied units.

(h) Early case detection and referral

- i. DCHA shall add to its notices to tenants relating to criminal activity by tenant, occupant, or guests of the tenant (also called “Fightback” notices) that the tenant has ten (10) business days to notify DCHA that they wish to request a meeting with the DCHA contact person (whose name and contact information will be identified in the notice), to discuss the claims in the notice and attempt to arrive at a resolution to the notice. The tenant may bring any advocate (including an attorney or case worker) to the meeting. If no request is received from the tenant, a case may be filed immediately at DCHA’s sole and absolute discretion. If a meeting is requested, it will be scheduled within twenty (20) business days from the date of the request. If the matter is not resolved during the meeting or any subsequent agreed-upon meeting, DCHA may immediately file an action in court. This notice must be preceded by the referrals outlined in 2(h)(ii).
- ii. Within three (3) days (or the next business day if the third day falls on a weekend or holiday) of identifying drug- or firearm-related activity within the security camera monitoring, and corroborated with an MPD incident report, and the specific unit number where the activity occurred, and/or individuals who engaged in the activity are identified, independent of whether charges have been brought by law enforcement, DCHA shall provide the tenant with an e-mail address ([DCHAEvictionPrevention@gmail.com](mailto:DCHAEvictionPrevention@gmail.com)) and a flyer (*See Exhibit E*) for available non-profit legal services. DCHA will also provide individuals who require mental health services with an address and telephone number for the Department of Behavioral Health (“DBH”) at: <https://dbh.dc.gov/page/apra>.

(i) Community Engagement

- i. DCHA shall invite their Resident Councils to quarterly meetings for each MPD District, rotating locations of the meetings at the Properties within the MPD Districts, to discuss the following: issues involving illegal activity at the DCHA Properties in that MPD District; the residents’ view of the level of success of the security plan; the availability of services to address crime reduction more holistically; and

ways non-policing and restorative justice may resolve issues of drug- and firearm-related criminal activity at the Properties.

- ii. These meetings shall be attended by DCHA Area and Housing Managers and DCHA Office of Resident Services.
- iii. Invitations shall also be extended to representatives from DCHA's landlord and tenant counsel, DCHA's Office of General Counsel, DCHA's Office of Public Safety, MPD, OAG, and DBH, nearby hospital and other learning institutions for medical professionals, and legal services providers (e.g., Bread for the City, Empower DC, Legal Counsel for the Elderly, Neighborhood Legal Services Program, Rising for Justice, The Legal Aid Society of the District of Columbia, Washington Lawyers Committee, and Washington Legal Clinic for the Homeless). Attendance of representatives from the various entities and organizations are not required for DCHA to be in compliance with Section 2(i)(i) and this Section.
- iv. Tenants will be able to invite supporters (e.g., community social workers or other organizational representatives) to be present at the meetings. During the public health emergency period, as defined by Mayoral Orders, these quarterly meetings may be conducted virtually using WebEx or any other similar online platform.

(j) Physical Security Coverage

- i. By October 31, 2020, DCHA shall add six (6) special police officers to its security personnel; and by January 31, 2021, DCHA shall add six (6) additional special police officers and two (2) DCHA police officers in order to ensure that the Properties have adequate security coverage from the hours of 3 p.m. to 7 a.m., daily. By January 31, 2021 DCHA will use these additional security personnel to supply the following security coverage for the two aforementioned shifts needed each day at the Properties: three (3) security personnel covering Benning Terrace, Kenilworth Courts, Lincoln Heights, Richardson Dwellings, and Stoddert Terrace; two (2) security personnel, covering Carroll Apartments, James Creek and Syphax Gardens; one (1) security personnel covering Ledroit Apartments and Kelly Miller Apartments; and one (1) security personnel covering Langston Terrace. Nothing in this Consent Order prevents OAG from petitioning the Court, with or without DCHA's consent, for greater security coverage based on crime trends at the Properties.
- ii. DCHA shall provide security personnel schedules (covering security personnel's names, contact information, location of coverage, coverages dates and times) to OAG by e-mail to undersigned counsel

or other designees seven (7) days before the beginning of each new month.

- iii. When conducting patrols of the properties, all security personnel shall be equipped with DCHA mobile phones which will have a reporting application allowing for instantaneous updates to DCHA OPS Headquarters and DCHA Property Management. Using the data collected from these patrols, DCHA will conduct a daily analysis and will program the security cameras at the Properties referenced in 2(b) above to focus on property locations where crime is trending.
- iv. DCHA shall ensure that the armed DCHA officers or special police officers will, as part of their duties, enforce barring notices pursuant to Section 2(k) below and will take the enforcement actions pursuant to Section 2(c)(iii) above.
- v. The parties reserve the right to request an in person or virtual meeting, each month, after the reports are submitted to the District as required by Sections 2(g)(i) and 2(k)(ii).

(k) Barring Notices

- i. DCHA, on its own initiative or at the request of the District and/or MPD, shall bar individuals identified as having engaged in drug- and firearm-related criminal activities at the Properties who are not tenants or authorized occupants (i.e., identified in a lease as an authorized occupant) but are guests of tenants, authorized occupants or trespassers of the Properties for a period of up to five (5) years or until such earlier time which conform with D.C. municipal barring regulations.
- ii. DCHA shall submit copies of all served barring notices with the monthly report that DCHA is to submit to the District seven (7) days prior to the beginning of each month.
- iii. DCHA shall ensure that the armed DCHA officers and special police personnel on duty are trained to identify individuals who are the subject of barring notices, serve barring notices, and arrest (or call MPD to arrest) individuals who violate the barring notices when appropriate.
- iv. DCHA shall fully cooperate with the prosecution of criminal charges relating to activities on the Properties, including, but not limited to, providing oral or written testimony for litigation.

3. **PROPERTY WALK-THROUGHS**. Beginning within five (5) days of signing this Consent Order, DCHA staff will walk each property at least once daily, nine (9) times per week, using the checklist included in **Exhibit F** to ensure DCHA is complying with the

security requirements of Sections 2(a) through 2(g). DCHA shall maintain the checklist within an on-line application. In the case of townhomes which DCHA does not manage it will include this walk thru checklist requirement in its management agreement.

4. **VIOLENCE INTERRUPTION PROGRAM.** DCHA shall pay to the District \$500,000, made in five \$100,000 annual payments, the first to be received by January 31, 2021, and the remaining payments to be received by the 31<sup>st</sup> of January for the four ensuing years through the last payment due January 31, 2025. The payment shall be made to the Office of the Attorney General in any way and manner (e.g. check, cashier's check, direct deposit) required by the OAG. The payments will be used for violence interruption services in and around one or more of the Properties. The progress and implementation of such violence interruption program may be discussed during a requested meeting as provided under Section 2(j)(v).
5. **INSPECTION.** The District, by and through its agents, reserves the right to inspect, without notice, the exterior grounds and common areas of the Properties to confirm DCHA's compliance with the terms of this Consent Order.
6. **ENFORCEMENT OF TERMS BY OAG.** The Court retains jurisdiction over this matter in the event of default. If DCHA fails to comply with or complete the obligations set forth in Paragraphs 2 or 3 above or with this paragraph, OAG may provide written notice of such failure or deficiency ("Notice of Default") to DCHA's Executive Director and General Counsel via e-mail, and which shall provide, and must so state, that DCHA shall have fourteen (14) days to cure such failure(s) or deficiency(ies) specified in the Notice of Default. Should DCHA fail to timely complete the obligation(s) identified in the Notice of Default, OAG shall have the right to file against DCHA in the Civil Division of the Superior Court of the District of Columbia and provide a motion to show cause why DCHA should not be held in contempt of Court for violating this Consent Order. If the Court holds that DCHA is in contempt of this Consent Order, DCHA and the District agree that DCHA shall pay a \$150 per day penalty to the District for each Property which remains non-compliant following the foregoing notice of default and cure period. DCHA shall maintain the right to an evidentiary hearing on any motion to compel compliance filed by the District.
7. **TERM OF AGREEMENT.** This Consent Order shall remain in effect for five (5) years from the date of execution of this Consent Order, or for such length of time as DCHA remains the owner of the Properties, regardless of change of management of the Properties. Nothing in this Consent Order prevents the District from filing any enforcement action based on new drug- and firearm-related nuisance activity on any of the Properties. DCHA reserves all defenses to any such action.
8. **APPLICABILITY OF THIS AGREEMENT.** The obligations under this Consent Order shall only be the obligations of the Parties to this Consent Order.

Date: September 10, 2020

Respectfully Submitted,

KARL A. RACINE  
Attorney General for the District of Columbia

KATHLEEN KONOPKA  
Deputy Attorney General  
Public Advocacy Division

JIMMY ROCK  
Assistant Deputy Attorney General  
Public Advocacy Division



---

JENNIFER L. BERGER [Bar No. 490809]  
Chief, Social Justice Section  
Public Advocacy Division

MONIQUE COBB [Bar. No. 1531175]  
ARGATONIA WEATHERINGTON [Bar No.  
1021691]  
STEPHON WOODS [Bar No.1025232]  
Assistant Attorneys General  
400 6<sup>th</sup> Street, NW, 10<sup>th</sup> Floor  
Washington, D.C. 20001  
(202) 727-1038 (phone)  
Email: [Jennifer.Berger@dc.gov](mailto:Jennifer.Berger@dc.gov)  
*Attorneys for the District of Columbia*

*Toyja Kelley Sr.*  

---

TOYJA E. KELLEY  
Bar No. 482977  
500 E. Pratt Street, Suite 900  
Baltimore, MD 21202-3133  
(410) 332-8689 (tel)  
E-mail: [Toyja.Kelley@saul.com](mailto:Toyja.Kelley@saul.com)

JEFFREY H. GELMAN  
Bar No. 386448  
(202) 295-6647 (tel)  
E-mail: [Jeffrey.Gelman@saul.com](mailto:Jeffrey.Gelman@saul.com)

**IT IS SO ORDERED.**

\_\_\_\_\_  
Judge Fern Flanagan Saddler

\_\_\_\_\_  
Date

# **Appendix B**

---

## Work Order Review and Consent Order Review Methodology

# Work Order Review Methodology

---

The audit reviewed items in the Consent Order related to cameras, exterior lights, no-trespassing and no-loitering signs, vacant units, secured entrances, security coverage, barring notices, property walk-throughs, and the violence interruption program. There were limitations regarding the extent to which the audit team could follow-up on certain requirements. For example, the audit team did not assess whether actions required soon after the execution of the Consent Order were completed at that time, but rather whether those items were still in effect.

The audit did not review requirements in the Consent Order related to abandoned vehicles, property maintenance, early case detection, or community engagement, because the team chose to focus on the physical public safety aspects of the Consent Order.

## Exterior Lights

The team searched all “light/ceiling fans” and “electrical” work orders created in Yardi between September 10, 2020, and September 3, 2025. Across the 10 properties, Yardi contained 1,244 light/ceiling fans work orders and 4,270 electrical work orders. To isolate work orders specifically related to exterior lights, ODCA searched the brief description category for descriptions that mentioned “exterior,” “pole,” “outside,” or “outdoor,” as well as for descriptions containing an address or building number. The search yielded 129 work orders. One work order (275126), although not containing any of the search terms, was referenced in other work orders as a light survey that reported outages and was therefore included. The audit team then reviewed the 129 work orders’ descriptions and any associated pictures in Yardi to determine whether each work order pertained to exterior lighting at a property. This review resulted in 75 work orders related to exterior lights, which included one work order that had not been completed. The team removed the open work order and reviewed 74 work orders related to exterior lights. For each work order, the audit team calculated the number of business days between the call and work completed dates, excluding District holidays.

## Cameras

The team searched all “CCTV” work orders created in Yardi between September 10, 2020, and September 3, 2025. Across the 10 properties, Yardi contained 365 CCTV work orders. To isolate work orders related specifically to non-operational cameras or access to footage needing to be restored, the audit team reviewed the brief descriptions. The team excluded 36 work orders because they were unrelated to non-operational cameras or access issues; 21 of those work orders were reviewed by DCHA’s IT Building Tech Lead, who reported that only two of the 21 work orders involved a non-operational camera or an access issue. An additional 25 work orders were removed from the final review because the work orders had not been completed, 20 of those were canceled and the remaining five were still scheduled. The process resulted in 304 work orders related to cameras being non-operational or users unable to access footage. For each work order the audit team calculated the number of business days between the call and work completed dates, excluding District holidays.

## Doors

The team searched all “doors, windows and railings,” “access control,” and “lock/keys” work orders created in Yardi between September 10, 2020, and September 7, 2025. Across the 10 properties, Yardi contained 11,189 work orders for doors, windows, and railings, 51 access control work orders, and 2,630 lock/keys work orders. To narrow the results, ODCA searched the brief description category for terms like “malfunction,” “automatic,” “entrance,” “entry,” “inoperable,” or “building door.” This search yielded 561 work orders from all three categories that remained in the review.

The audit team reviewed each of the 561 work orders descriptions and pictures in Yardi to finally decide whether the work orders were related to malfunctioning unit or building doors. This review identified 403 qualifying work orders. Of these, 12 were removed because the work had not been completed, resulting in 391 work orders for analysis. For each order, the audit team calculated the number of business days between the call and work completed dates, excluding District holidays.

# About ODCA

---

The mission of the Office of the District of Columbia Auditor (ODCA) is to support the Council of the District of Columbia by making sound recommendations that improve the effectiveness, efficiency, and accountability of the District government.

To fulfill our mission, we conduct performance audits, non-audit reviews, and revenue certifications. The residents of the District of Columbia are one of our primary customers and we strive to keep the residents of the District of Columbia informed on how their government is operating and how their tax money is being spent.

**Office of the District of Columbia Auditor**  
**1331 Pennsylvania Avenue, N.W.**  
**Suite 800 South**  
**Washington, DC 20004**

202-727-3600  
odca.mail@dc.gov  
[www.x.com/ODCA\\_DC](http://www.x.com/ODCA_DC)  
[www.dcauditor.org](http://www.dcauditor.org)



Information presented here is the intellectual property of the Office of the District of Columbia Auditor and is copyright protected. We invite the sharing of this report, but ask that you credit ODCA with authorship when any information, findings, or recommendations are used. Thank you.

