

2019

# REGULATORY REFORM WORKING GROUPS



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DC GOVERNMENT OF THE  
DISTRICT OF COLUMBIA  
MURIEL BOWSER, MAYOR

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# **Regulatory Reform Working Group**

## Regulatory Reform Working Group

As part of DCRA Vision 2020, the Regulatory Reform Working Group was established to identify outdated regulations on health, safety, and unnecessary barriers to economic development in the District. Given the diverse scope of issues identified, the Working Group divided up into three Subcommittees which were charged with focusing on different areas of concern: the Business, Professional, and Occupational Licensing Subcommittee; the Building Permit Subcommittee; and the Inspections Subcommittee.

## Regulatory Reform Working Group Members

**Lisa Abrams**, Vice President of Government Affairs, Hotel Association of Washington DC (HAWDC)

**Pedro Agosto**, Chief Information Officer, DCRA

**Christopher Bailey**, Deputy Chief Building Official, DCRA

**Jill Byrd**, Program Manager, DCRA

**Anovia Daniels**, Communications Manager, DCRA

**Liz DeBarros**, Senior Advisor for the District of Columbia Building Industry Association (DCBIA)

**Patricia Donkor**, Deputy General Counsel, DCRA

**Mark Eckenwiler**, Commissioner, ANC 6C04

**Eric Jones**, Associate Director Government Affairs, Association Builders and Contractors of Metro Washington

**Matthew LeGrant**, Zoning Administrator, DCRA

**Lisa Mallory**, Chief Executive Officer, District of Columbia Building Industry Association (DCBIA)

**Randi Marshall**, Vice President of Government Affairs D.C., Residential, Apartment and Office Building Association (AOBA) of Metropolitan Washington

**Eric Mayl**, Principal, Project Manager, Core Engineers Consulting Group (CORE)

**Vincent Parker**, Business and Professional Licensing Administrator, DCRA

**Erika Wadlington**, Director of Government Relations, DC Chamber of Commerce

**Garret Whitescarver**, Chief Building Official, DCRA

## **Business, Professional, and Occupational Licensing Subcommittee (BPOL)**

This Subcommittee was charged with examining the feasibility of streamlining the business, professional, and occupational licensing processes to make it easier for people to start a business in the District.

The members of the BPOL Subcommittee were:

Jill Byrd

Eric Jones

Randi Marshall

Vincent Parker (Chair)

Erika Wadlington

### Background

When the Subcommittee first met, there were 113 business or occupational licenses issued by DCRA. Many of these licenses have similar licensing requirements and regulate similar types of business activity. Additionally, there were 15 licensing categories that had 11 or fewer licensees. This made it challenging for people seeking to start a business to navigate the business licensing process and determine which license or licenses are required.

### Recommendation

The BPOL Subcommittee recommended various revisions to the Business Licensing Program that are designed to ensure BBL requirements are based on the D.C. Code and the District of Columbia Municipal Rules (DCMR): eliminate

unnecessary or antiquated licensing categories; and consolidate the 113 individual business categories into 12 new groups of BBL requirements. The complete elimination of certain licenses will require a legislative and/or regulatory change; however, as an initial step towards achieving this goal, the Subcommittee recommended that DCRA remove under-utilized licenses from the agency's website and work with applicants to determine if there is a more appropriate license.

#### Streamlined Business Licensing Initiative

DCRA rolled out a new streamlined business licensing process in the fall of 2019. Under the new licensing process, related BBLs with the same licensing requirements are grouped together to make it easier for applicants to determine which type of BBL they need. Since there are no changes to the actual licensing requirements of any BBL, no statutory or regulatory changes are required. Information on the new BBL process can be found on [DCRA's website](#).

## **Building Permit Subcommittee**

The Building Permit Subcommittee was charged with reviewing and making recommendations on recurring issues related to building permits.

The members of the Building Permit Subcommittee were:

Christopher Baily

Anovia Daniels

Liz Deberros

Mark Eckenwiler (Chair)

Eric Jones

Matthew LeGrant

Eric Mayl

Randi Marshall

#### Recommendations

The Building Permit Subcommittee made several recommendations for DCRA to consider in the areas of noise regulations, property lines, and agency transparency.

## 1. Noise Regulations (including the noise restrictions for after-hours permits)

### Background

The Building Permit Subcommittee noted that DCRA enforces noise restrictions under two separate, but related, sets of rules. The primary body of regulations are Chapters 27-29 of Title 20 of the DCMR. Since the Title 20 provisions set maximum noise levels for both daytime and nighttime for, among other sources, construction, they incidentally implicate the hours restrictions and after-hours permitting rules found at Chapter 12-A DCMR §§ 105.1.2 and 105.1.3. The Subcommittee recommended that the maximum noise levels in Title 20 should be re-examined in light of current conditions and practices within the District, as well as the characteristics of present-day equipment, as many routine construction activities cannot feasibly be performed consistent with the maximum noise levels set out at 20 DCMR § 2802.1 of 80 dBA  $L_{eq}$  (general restriction) and 60 dBA (residential & certain other zones). The formal variance process is too cumbersome to apply on a routine basis.

## 2. Property Line Construction Issues

### Background

Questions and disputes over property-line construction are common, especially in rowhouse neighborhoods and other areas in the District where buildings are constructed on or near the property line. These issues present themselves in a variety of scenarios, including underpinnings and construction of rooftop additions extending above an existing party wall. Moreover, depending on the scenario, a range of specific practical and legal questions may arise including: a neighbor's right to notification; the form for neighbor notification; the right to access an adjacent property either to perform affirmative work or to protect the adjacent property from damage; and complex engineering questions such as snow-load impacts occasioned by building higher than the roof of an adjacent structure. Conflict over these issues consumes significant resources of developers, adjacent property owners, and DCRA staff. In recognition of the importance of these issues, DCRA issued two administrative bulletins in 2015 addressing neighbor notification in certain zones (2015-02) and underpinning that impacts a party wall (2015-01). The Subcommittee recommended that DCRA adopt additional written policies, whether or not in the form of administrative bulletins, to provide guidance and clarity on other commonly recurring issues in this area.

### 3. Greater Transparency as to Rules of Interpretation and Submittal Documents

#### Background

As with any body of law, the District's zoning regulations and Construction Codes require interpretation and, at times, the exercise of judgment to resolve ambiguities or address conditions not anticipated by the regulations/Codes. As a result, DCRA officials have adopted additional rules on top of the published laws. One concern raised by the Working Group was that these supplemental rules are not readily accessible to the public, and at times are internally inconsistent. For example, although the Zoning Administrator's determination letters may be found online, they are:

- not text-searchable (except for the short title);
- not indexed, sorted, or otherwise organized in a manner that allows easy location of determinations on a specific topic; and
- at times inconsistent with previous interpretations on the same question.

Similarly, DCRA approves code modifications and issues written direction to staff related to code compliance matters, but guidance on these matters is usually inadvertently closely held within the agency. Another concern was the view that historically, DCRA has not fully complied with D.C. Official Code § 2-536(a)(8A), which requires “[a]ll pending applications for building permits and authorized building permits, including the permit file,” be available to the public online.

#### Recommendations

(A) Providing access to residents, designers, and building professionals would help ensure early compliance, increase initial compliance, reduce re-reviews and re-inspections, limit the need for multiple intake reviews, reduce overall review time, and allow the public to better understand the DCRA process. Therefore, the Subcommittee recommended that supplemental zoning and code interpretations be made publicly available in an easily assessable and searchable format.

(B) DCRA should make all pending applications for building permits and authorized building permits, including permits filed publicly, available on its website.

## Availability of Records Online

DCRA has expressed its commitment to making permits and permit applications available online. Building permits, building permit applications, invoices, approved building permits, building plans, and certificates of occupancy are now available and can be searched using our [DCRA E-Records Management System](#). Zoning Interpretations issued by the Zoning Administrator are now being made available on DCRA's new customer focused website and can be found [here](#). The Office of the Zoning Administrator is working to have all Zoning Interpretations available online before December 31, 2019. Zoning Determinations can be found [here](#).

## **Inspections Subcommittee**

The Inspections Subcommittee focused on two areas of concern: Stop Work Orders and Commercial Vacant Building Process.

The members of the Inspections Subcommittee were:

Lisa Abrams

Liz DeBarros

Mark Eckenwiler

Eric Jones

Randi Marshall

Erika Wadlington

Garret Whitescarver (Chair)

## Background

Stop Work Orders (SWOs) may be issued when building inspectors observe construction activities that are either in violation of the law or are not allowed under existing permits. No work is to be conducted on the site where a SWO has been issued unless, and until, the SWO is lifted by DCRA; however, there have been many instances where work has continued in violation of the law while a SWO was in effect. The Subcommittee considered possible avenues for increasing penalties against people who continue to perform work after a SWO has been issued, including the feasibility of seeking criminal sanctions against recidivists, which would require coordination with the Office of the Attorney

General (OAG). Another initiative discussed was utilizing DCRA's ability to automatically double or triple fines for repeat violators.

### Recommendations

The Subcommittee ultimately concluded that seeking criminal sanctions for violations of SWOs is an area that will require further review and coordination with OAG.

The Subcommittee recommended amending Chapter 32 of Title 16 of the DC Code of Municipal Regulations to increase the fines from \$2,000 to \$8,000 for any violation of 12A DMCR § 114.9 - Failure to Comply with Stop Work Orders.

# **Compliance and Enforcement Working Group**

## **Compliance and Enforcement Working Group**

The Compliance and Enforcement Working Group was formed in February 2019 and was charged with reviewing the current and proposed compliance and enforcement policies and practices and making recommendations to DCRA on strategies to increase compliance and improve efficiencies in enforcement. The Group's focus was on reviewing the enforcement policy under consideration by DCRA under which inspectors who observe property maintenance code violations that had not been addressed by the property owner would issue a Notice of Infraction (NOI) instead of a Notice of Violation (NOV).

## **Compliance and Enforcement Working Group Members**

**Pedro Agosto**, Chief Information Officer, DCRA

**Patrick Allen**, Housing Code Enforcement Officer, DCRA

**Monique Bocock**, Senior Policy Advisor, DCRA

**Anne Cunningham**, Senior Policy Attorney, Children's Law Center

**Patricia Donkor**, Deputy General Counsel, DCRA

**Chuck Elkins**, Commissioner, ANC 3D01

**Ferdinand Gamboa**, Property Maintenance Inspections Program Manager, DCRA

**Beth Harrison**, Housing Law Unit Supervisory Attorney, Legal Aid Society of the District of Columbia

**Randi Marshall**, Vice President of Government Affairs D.C., Residential, Apartment and Office Building Association (AOBA) of Metropolitan Washington

**Holly Muhammad**, Commissioner, ANC8A01

**Dan Palchick**, Senior Attorney, Legal Counsel for the Elderly

# Housing Code Enforcement

## Background

Historically, when DCRA sent an inspector to a property based on a complaint of a potential housing code violation, the inspector would issue a notice of violation (NOV) if a violation was found at the property during the inspection. Once the NOV was issued, the property owner would have a certain number of days to abate the violation, but no fine would be assessed at that time. After the abatement period had passed, DCRA would conduct a re-inspection at which time the inspector would issue a notice of infraction (NOI) if the violation still existed. The NOI states the assessed fine and gives the property owner, or respondent, 15 days to respond, or 20 days if received by mail. In addition to stating the assessed fine amount, the NOI also informs the property owner how to challenge the fine by requesting a hearing before the Office of Administrative Hearings (OAH).

Given the low rate of abatement relative to the amount of resources expended by the agency conducting inspections and re-inspections for every violation, DCRA sought to streamline the enforcement process by issuing NOIs at the time of the initial inspection.

## Recommendations

The Working Group reviewed the proposed change in the enforcement policy for complaint-based housing inspections and presented several recommendations. These recommendations were related to: the anticipated increase in the number of NOIs issued and the resulting increase in the number of hearings requested at the OAH; the need for written policies reflecting the change in the enforcement policy; ensuring housing providers receive notification of a violation; and ensuring that housing providers are provided the opportunity to abate violations prior to receiving a fine.

Anticipated increase in the number of NOIs issued. Several Working Group members expressed concern regarding the anticipated increase in the number of NOIs issued and the resulting number of cases that would be referred to the OAH for a hearing. The Working Group made the following recommendations to address this concern:

1. There will need to be a uniform approach to initial inspections and the issuance of NOIs;
2. There will need to be additional inspectors and attorneys to adjudicate NOIs at the OAH;

3. There will need to be a new approach to re-inspection and confirming that violations have been abated;
4. DCRA should use available data to project the expected increase in NOI appeals filed with the OAH; and,
5. DCRA should develop a detailed staffing plan to include hiring a sufficient number of inspectors to attend hearings at the OAH, in addition to their existing duties; and hiring a sufficient number of attorneys to oversee and participate in adjudication of NOIs at the OAH, including being able to deploy attorneys to hearings in cases raising difficult legal issues or against repeat violators.

Written policies and procedures. Working Group members noted that DCRA will need to update its standard operating procedures (SOPs) to indicate that an inspector will issue an NOI upon conducting an inspection and finding housing code violations. It was also recommended that these updated policies make clear that inspectors will take a uniform approach when conducting initial inspections and issuing NOIs. Specific recommendations regarding the changes that should be included in updated SOPs included:

1. Inspectors should issue NOIs upon finding housing code violations, bypassing the NOV process;
2. Inspectors should apply this new procedure uniformly to both complaint-based and proactive inspections, regardless of any individual circumstances;
3. Landlords who object should be informed that they have the right to appeal the NOI to OAH.

Notice of violations. Another concern raised by some Working Group members was ensuring that housing providers had notice of the violation and an opportunity to abate the violation prior to facing a fine. One of the issues raised by a Working Group member concerned DCRA's intent to use contact information for housing providers from corporation registration and business license documents filed with DCRA. It was noted that many rental housing businesses do not directly manage the properties they own, and often the mailing addresses or points of contact included in business filing documents are directed to registered agents, corporate offices, tax/accounting firm, or P.O. boxes, and are not directed to property owners or property management personnel. This could lead to a circumstance where a housing provider's notification is directed to the improper point of contact or location or could potentially get lost, which raises service of process issues that could affect adjudication at the OAH. To ensure higher housing provider response rates, it was recommended that:

1. DCRA create a housing provider registration process, which establishes a housing provider directory for internal use by the agency. This directory would provide the agency with the accurate contact information of a property manager for a rental housing building and ensure that notifications from DCRA regarding housing code violation complaints reach the person who has the authority and ability to respond and abate the issue in a timely manner; and
2. DCRA require that the tenant, or their advocate designee, provide the contact information of the property manager with the initial complaint.

Opportunity to Abate. To address the concern that housing providers would face a fine before having an opportunity to abate a violation, one Working Group member recommended that DCRA retain and repurpose the existing timetables that are being used for the initial inspection and the abatement period, to instead be used for the “NOI First” policy change. The reasoning is that by retaining the same timetables, the process remains familiar and easier to follow and comply with for both tenants and housing providers.

Under the proposed repurposed timeline, for emergency issues, the housing provider must respond to DCRA's housing code violation notification within 24 hours of the date of the complaint. The housing provider would then have one (1) day to abate the violation before an inspection is conducted. After the expiration of a 30-day abatement period, an inspection would be conducted and if the violation has not been abated, or there is not evidence of a good faith effort to abate, DCRA may issue an NOI.

For routine issues, the housing provider would have to respond to DCRA's housing code violation notification within fifteen (15) days of receipt of the complaint. Once the housing provider responded, they would have 30 days to abate the violation and after the expiration of the 30-day abatement period, an inspection would be conducted. If the violation has not been abated at the time of inspection, or there is no evidence of a good faith effort to abate, DCRA may issue an NOI.

Therefore, under this recommendation, a housing provider has 32 days to abate emergency issues and 45 days to abate routine issues before an NOI is issued. After the NOI issued, the housing provider will have another 15 days, or 20 days if served by mail, to respond to the NOI before the NOI can be filed with OAH in accordance with OAH's rules. This is a total of at least 47 to 52 days for emergency issues, and 60 to 65 days for routine issues, before an NOI can even be filed. Added to this would be the time it takes for a hearing to be held. This

recommendation does not adequately address DCRA's concern of the length of time that it would take before a fine for an outstanding violation could be assessed.

### Streamlined Enforcement Policy

DCRA implemented its streamlined enforcement policy for complaint-based housing inspections on May 1, 2019. It is important to note that this streamlined policy does not apply to proactive housing inspections. Under the new policy, if a complaint is received, staff in DCRA's Inspections and Compliance Administration (ICA) will collect as much information from the complainant, including whether the complainant has notified the housing provider of the violation. ICA staff will schedule an inspection and make efforts to contact the housing provider by phone, email or both based on available contact information. The purpose of the notification is to inform the housing provider that a complaint has been received and the time and date of the scheduled inspection. The housing provider is also instructed to contact DCRA. Inspections are scheduled within one day for health and safety violations and within 15 days for routine inspections. As part of this "triage" process, both the complainant and the housing provider are instructed to contact DCRA if the reported violation is abated prior to the inspections. If the tenant confirms abatement prior to the inspection, the inspection is cancelled. If there is no confirmation of abatement, the inspection will be conducted as scheduled and the inspector will prepare an NOI for any observed housing code violations that have not been abated. A robust triage process provides transparency to all parties and affords housing providers an opportunity to address reported violations prior to an inspection and issuance of an NOI.

DCRA has proactively reached out to housing providers to notify them of the change in enforcement policy. Consistent with one of the Working Group recommendations, DCRA has created a digital portal that allows housing providers to submit the contact information for the individual who is responsible for addressing property maintenance issues. DCRA has worked with industry stakeholders in getting the message out to housing providers and conducted two email campaigns on April 19, 2019 (21,005 emails delivered) and May 1, 2019 (8,619 emails delivered). DCRA also did a mail campaign in November 2019 to more than 4,500 District landlords. Over 15,000 housing providers have registered through the portal.

As part of the streamlined enforcement policy, housing inspectors have been equipped with tablets that allow them to document violations, including taking pictures, and complete the inspection in Accela so the NOI can be drafted

electronically. This eliminates the need for inspectors to have to return to the office to prepare paperwork which can lead to delays and errors. Since inspections are completed electronically in the field, the results can be transmitted and made available to the Office of Civil Infractions (OCI) through Accela. This allows OCI staff to immediately begin finalizing the NOI, and gather the necessary information to send it to the housing provider.

Moving to a digital NOI process and reducing redundant operational processes have led to greater efficiencies which has allowed DCRA to implement the streamlined enforcement policy without the need to hire additional staff. As a result, despite issuing more than 1767 NOIs since May 1, 2019, DCRA exceeded its performance goals related to inspections and NOI processing in the third and fourth quarters of Fiscal Year 2019. DCRA's Inspections and Compliance Administration and the Enforcement Administration have issued new or revised SOPs which reflect the streamlined enforcement policy. These SOPs cover the triage process that takes place when a complaint is received, preparation and service of NOIs on the respondent, and filing cases with OAH.

Two recommendations not specifically addressed by the streamlined enforcement policy are the recommendation for DCRA to withdraw NOIs filed with the OAH where abatement has occurred and the recommendation of increased fines and penalties.

Withdrawing NOIs. One Working Group member recommended that DCRA withdraw NOIs that have been filed with the OAH in circumstances where the housing provider abates a violation before the OAH hearing date. This would allow housing providers the opportunity to avoid a hearing and a fine. The rationale behind withdrawing the NOI is that it would incentivize housing providers to continue to pursue abatement efforts and would provide a reprieve for housing providers who abate violations. This option would also offer relief for the OAH's anticipated increased caseload, as NOIs can be removed from the OAH docket where violations are abated.

Although DCRA does not automatically withdraw NOIs that have been filed with the OAH if the violation is abated, proof of abatement is a factor that can and often is considered by DCRA in deciding whether to enter into a settlement agreement which would include a reduced fine.

Increased fines and penalties. Another working group member noted that issuing NOIs should increase the deterrent effect on landlords and lead to better compliance in the long run. It was further suggested that this deterrent effect can be multiplied if DCRA pairs the "NOI First" policy with increased penalties for landlords who do not come into compliance and a shifting of the burden to

landlords to demonstrate compliance. It was, therefore, recommended that SOPs should include the following processes:

1. Once an NOI is issued, the inspector will immediately schedule a second inspection to occur within 15 days;
2. Following the second inspection, if violations remain unabated, the inspector will issue a notice informing the landlord that they must notify DCRA once it has abated the violations;
3. Once DCRA receives this notification back from the landlord, the inspector will promptly re-inspect and determine if violations remain unabated. If violations remain, the inspector will repeat the above process; and
4. Following the second inspection, DCRA will impose a daily fine on the landlord until the inspector determines that all violations have been abated, per the above process.

Assessing daily fines for unabated violations creates evidentiary challenges that must be addressed for DCRA to be able to successfully litigate these types of cases at the OAH; however, as part of the digital transformation that is underway, DCRA has strengthened and improved the tracking of NOIs to make it easier to identify repeat offenders. Armed with this information, DCRA can use the escalation of fines provision currently authorized in Title 12 of the DCMR to deter future violations. The streamlined enforcement policy goes hand-in-hand with the escalation in fines by decreasing the time for issuance of an NOI and subsequent adjudication of the assessed fines. This means those violations, once adjudicated, can serve as a basis for an escalation of fines for repeat violations.

## **Illegal Construction Compliance**

### Background

Although housing inspections was the primary focus of the Compliance and Enforcement Working Group, there was a limited discussion on the boarder compliance concerns related to illegal construction. In general, Working Group members felt that DCRA needs to establish policies and utilize tools and resources to improve compliance.

### Recommendations

Several recommendations were offered to address compliance issues in the area of illegal construction. DCRA intends to submit these recommendations for review

by a working group which would include building and construction industry stakeholders who have the relevant expertise, knowledge and experience.

- A. Requiring Residential Certificate of Occupancy. It was noted that the Zoning Administrator and DCRA enforcement staff have little or no leverage over a residential builder who violates the building code or a zoning regulation. The recommendation was to require certificates of occupancy for residential construction projects that involve either a raze or a major renovation. The rationale for this recommendation was that requiring certificates of occupancy would require the builder to show that the construction meets all of the requisite requirements and would give teeth to DCRA enforcement actions.
- B. Allowing ANC Commissioners to submit legally sufficient evidence of violations of the Building Code, Zoning and Stop Work Orders. This would address two perceived major weaknesses regarding illegal construction: (1) current reliance on receipt of citizen complaints to trigger an inspection, and (2) a DCRA inspector having to observe a violation in person. The recommendation was to allow ANCs to file affidavits, with photos and videos as appropriate, regarding violations of Stop Work Orders or illegal construction or zoning complaints. The ANC would then serve as the witness at an administrative hearing on the violation. It was also recommended that DCRA continue to train interested Commissioners to improve their skills in identifying violations. With this recommendation in mind, DCRA hosted a training on November 7, 2019 for ANCs on how to spot illegal construction and what enforcement actions can be taken.
- C. Allowing ANC Commissioners to be reviewers of draft building permits. In order to reduce the likelihood of errors discovered after a permit has been issued, it was recommended that ANC Commissioners be invited to participate in the review of any draft plans in their Single Member Districts (SMD).
- D. Requiring all permits application to be filed online and made available to the public. The stated rationale for this recommendation is that requiring applications to be submitted online and available to the public would led to transparency and accountability.
- E. Establishing an Ombudsman.
- F. Requiring permits to be readable and understandable from the street.
- G. Requiring certain notations on plans. Preventing Gross Floor Space violations by requiring notations on plans prohibiting the build-out of space, where building out the storage or unusable space shown on the plans would exceed the gross floor area regulations, without a permit.
- H. Benchmarking DCRA against similar agencies across the country.

- I. Additionally, there was a recommendation on how to prevent “Serial Permits.” There was a concern that many builders apply for a lower-threshold permit than they know they will need and then apply for a more accurate permit later hoping to avoid a close review of the project as a whole, which raises safety and compliance issues. With this in mind, the following solutions were proposed:
  1. When an applicant applies for an “additional” permit or an “amended” permit to supplement their initial permit, DCRA should be required to review the additional or amended permit holistically as if the full set of permits had been applied for originally.
  2. When a permit (or series of permits) exceeds a set percentage of the allowed gross floor area, lot occupancy, or other measurable restriction, a limiting notation should be placed on the plans highlighting the need for gross floor area to be re-calculated if there are any future permits applied for the building.
  3. DCRA needs to tighten the rules for the issuance of postcard permits and impose greater sanctions when builders go beyond the terms of the permit or otherwise violate building code and zoning regulation requirements.

## **Moving Forward**

DCRA would like to thank the members of its 2019 Working Groups for their invaluable contributions and time. The recommendations and feedback from each group were seriously considered by DCRA and guided a range of policy changes and improvements. To continue the important process of gaining ongoing input from District stakeholders, DCRA will be forming a 2020 Working Group in the first quarter of the new year.