



# Memo

**Date:** August 5, 2021  
**To:** Monica Martinez Simmons, City Clerk  
**From:** Nathan Torgelson, Director  
**Subject:** Rental Registration and Inspection Ordinance Annual Report

---

Attached, please find the Rental Registration and Inspection Ordinance (RRIO) Annual Report. This report is submitted as required by Ordinance 124011 Section 17, as amended by Ordinance 125343.

Like all of Seattle, the RRIO program was greatly affected by the COVID-19 pandemic. For the health and safety of our customers and City staff, the RRIO program suspended inspection operations in March 2020 following public health guidance. Customers were still able to register and renew rental properties online. The highlights of the RRIO program from 2020 are limited due to the effects of the pandemic:

- At the end of 2020, a total of 28,833 properties representing 156,172 rental units were registered. During 2020, RRIO saw a decrease in registrations with the RRIO program but the number of rental units registered with the program only slightly declined.
- In 2020, properties that originally registered in 2015 were required to renew their property registration after 5 years. Over the course of the year, the RRIO program issued 7,107 property registration renewals. Customers were able to complete the registration renewal process online and through the mail during the pandemic.
- In 2020, 1,038 properties completed and passed the inspection requirement. As expected, the RRIO inspections are down for 2020 and the program did not meet the minimum target of inspecting 10% of properties due to the pandemic. The program is currently preparing to restart inspections in August 2021.
- The RRIO program worked throughout the year to fix IT problems which staff was able to do remotely. Significant accomplishments include a new automated RRIO Certificate of Compliance process for customers who choose to complete the process with a city inspector, new automated email notifications for outstanding fees, and new reports for the program.

Please feel free to contact Geoff Tallent at [geoff.tallent@seattle.gov](mailto:geoff.tallent@seattle.gov) or 206-684-8452 if you have questions or would like more information.

# Rental Registration and Inspection Ordinance (RRIO)

2020 Annual Report to the City Council

August 2021



**RRIO Phone Line (206) 684-4110**

[www.seattle.gov/RRIO](http://www.seattle.gov/RRIO)



## **PURPOSE**

This report fulfills the requirement of Ordinance 124011 Section 17, as amended by Ordinance 125343, to report annually to the City Council on a variety of topics related to the Rental Registration and Inspection Ordinance (RRIO) program.

## **SUMMARY**

The highlights of the RRIO program from 2020 are limited due to the effects of the COVID-19 pandemic. For the health and safety of our customers and city staff, the RRIO program suspended inspection operations in March 2020 following public health guidance. With the positive vaccine rollout and lifting of public health restrictions, the goal for the RRIO program is to resume inspection operations by August 2021. Customers were still able to register and renew rental properties online or through the mail during the pandemic. Below are RRIO program highlights for calendar year 2020.

- At the end of 2020, a total of 28,833 properties representing 156,172 rental units were registered. During 2020 RRIO saw a decrease in registrations with the RRIO program but the number of rental units only slightly declined. The decline in registered rentals may be attributed to more rental properties being sold and becoming owner-occupied or it may be that some landlords simply decided not to renew their registrations during the pandemic. SDCI also slowed down enforcement of registration and renewal requirements during the pandemic, which may have contributed to the decrease in registered properties. In late summer 2021, the RRIO program will ramp enforcement activity back up with a main focus on bringing expired registrations back into compliance.
- The RRIO program began renewals of property registrations in 2019. In 2020, properties that originally registered in 2015 were required to renew their property registration. Over the course of the year, the RRIO program issued 7,107 property registration renewals.
- The program collected \$1,083,152 fees in 2020. Expenses exceeded revenue by \$788,212. The shortfall was expected due to the effects of the pandemic and the suspension of RRIO inspection operations. Revenues in 2021 are expected to increase as the first properties on the two-year registration cycle are due to renew. There will also be renewals from the previous five-year registration cycle (i.e., properties originally registered in 2016).
- In 2020, 1,038 properties completed and passed the inspection requirement. As expected, the number of RRIO inspections was down for 2020 and the program did not meet the minimum target of inspecting 10% of properties due to the pandemic. Enforcement for overdue inspections was also slowed during the pandemic due to the difficulty of safely completing in-person inspections.
- The RRIO program worked throughout the year to fix IT problems. Significant accomplishments include a new automated RRIO Certificate of Compliance process for customers who choose to

complete the process with a city inspector, new automated email notifications for outstanding fees, and new reports for the program.

- RRIO continues the auditing of private inspector inspections for multi-family properties that do not have 100 percent of units inspected. Audits slowed down during the COVID-19 pandemic due to the suspension of inspection operations. In 2020, 59 private inspection results were audited. 19 units were selected for additional inspections under expanded RRIO inspections at 7 multi-unit properties.
- The priority for the RRIO program is restarting inspection operations safely for both customers and staff. The RRIO program will resume property inspections in August 2021. Enforcement operations are expected to return to normal once inspections restart.

## **BACKGROUND**

The City adopted the Rental Registration and Inspection Ordinance (RRIO) in the fall of 2012. After significant work with stakeholders and development of an online registration tool, the Department began registering properties in 2014. RRIO requires that rental housing properties meet basic maintenance and safety standards, register with the City, and have periodic inspections. The basic safety requirements are laid out in a checklist developed with extensive input from stakeholders.

In addition, the Department implemented the Accela IT system to manage online registration and track program work. The IT system was fully integrated into the SDCI permit and complaint tracking system when Accela went live in 2018.

RRIO inspections began in 2015 with qualified private inspectors or with SDCI inspectors who complete the work as a fee-based service. All rental properties must be inspected at least once every 10 years. Some properties will be inspected as frequently as twice in ten years, based on a random selection process called out in the Seattle Municipal Code.

## **COVID RESPONSE**

The outbreak of the COVID-19 pandemic required significant adjustments to the RRIO program to protect the health and safety of RRIO customers and staff. In March 2020, under the Mayoral mandate, all RRIO staff transitioned to working from home to help slow the spread of the virus. In addition, the program stopped selecting properties for inspection and halted in-home inspection operations to help slow the spread of the virus. Registration and renewals were able to continue uninterrupted online and with limited in-office staff to process mail-in registrations. For property owners citing COVID-19-related hardships for renewals, the program offered delayed enforcement. Follow-up compliance for failure to complete an inspection or renewal was also slowed down during the pandemic, however the most

significant violations were pursued. In addition, the program continues to receive complaints and track non-compliance. Program performance for inspections, registrations, and renewals declined significantly in 2020 and that decline has carried through into 2021. The program expects to see operations increase beginning August 2021, with full recovery during 2022.

## **REPORT**

The following report topics, A – G, are required by Ordinance 124011 in uncodified Section 17, as amended by Ordinance 125343. SDCI also provides information below about other significant accomplishments or upcoming work for the program.

### **A. The status of rental property registration and rental property registration renewals**

By the end of the year, a total of 28,833 properties representing 156,172 rental units were registered. Total registrations decreased by 14.4 percent from 2019 (loss of 4,858 registrations with the program) but the total number of units stayed relatively stable with only a 0.65% decrease. The decline in registered rentals may be attributed to more rental properties being sold and becoming owner-occupied or it may be that some landlords simply decided not to renew their registrations during the pandemic. SDCI slowed down enforcement of registration and renewal requirements during the pandemic, which may account for some of the decrease in registered properties. Registered units may have been relatively stable because new properties coming online are typically larger and have more units than rental properties that are leaving the market by becoming owner occupied or re-developed. In late 2021, the RRIO program will ramp enforcement activity back up with a main focus on bringing expired registrations back into compliance.

The RRIO program began renewals of property registrations in 2019. Under the original program framework, properties were required to renew their property registration after 5 years. In 2020, renewals for medium sized rental properties (4-to-10-unit properties) which originally registered in 2015 came due for renewal. Over the course of the year, the RRIO program issued 7,107 property registration renewals. The RRIO program switched from a five-year registration renewal cycle to a two-year cycle at the beginning of 2019. The two-year cycle is expected be more efficient for RRIO administration by providing more frequent customer contact, steadier revenue, and steadier workloads over time. Existing original registrations retain their original renewal date. When registrations are renewed after five years, they will be converted to the two-year cycle.

The program continued to identify possible rental properties that had still not registered with the program, though this effort slowed after the emergence of the pandemic in March 2020. The program focused on pursuing unregistered properties primarily from public complaints and field observations. For non-compliant property owners, RRIO mailed warning letters and Notices of Violations (NOVs) to

prompt unresponsive property owners to register. The RRIO program was exploring hiring a third-party vendor to assist with data gathering on unregistered rentals to ramp up enforcement on unregistered rentals in Seattle. Due to the COVID-19 pandemic, the RRIO program slowed enforcement activity but plans to ramp enforcement activity back up to normal levels by the end of 2021. As soon as the program can recover from the COVID-19 pandemic, finding assistance on data gathering for unregistered rentals will be a top priority for the program.

**B. The status of rental property inspections including the number and type of inspection failures and resulting property improvements**

Inspection statistics for 2020 were:

Percent of registered properties that completed and passed an inspection in 2020	3.6%
Total number of properties that completed and passed the inspection requirement in 2020	1,038
Completed by Private Inspectors in 2020	584
Completed by City Inspectors in 2020	421
Completed by Alternate Means (such as HUD inspection) or a combination of inspection types	17
Completed by Mixed Inspection (Use of both City Inspector and Private Inspector)	16

During the COVID-19 pandemic, there was not a way to safely complete in-person, in-home RRIO inspections consistent with public health directives. This means that RRIO inspections are down for 2020 and the program did not meet the minimum target of inspecting 10% of properties. To date, the RRIO program has had 15,172 properties or 52.6 percent complete the inspection requirement. With the positive vaccine rollout and lifting of public health restrictions, the goal for the RRIO program is to resume inspection operations by August 2021. RRIO inspections will begin cautiously due to staff limitations and fluctuating safety requirements. For a short period of time, RRIO will allow customers who are still uncomfortable with allowing an inspector in their home to postpone the inspection requirement for a few months.

The RRIO program will start re-inspections when inspection operations can resume safely. This means that some properties that have already completed the inspection requirement will be randomly selected a second time for a re-inspection as outlined in the Seattle Municipal Code. Due to the outbreak of the COVID-19 pandemic, RRIO was not yet able to start selecting properties for re-inspection.

For a rental property to pass a RRIO inspection and be considered complete, the property needs to be issued a Certificate of Compliance. When a property fails a RRIO inspection, the inspector identifies what corrections need to be made and works with the customer to get the property into compliance with the

RRIO checklist standards. Rental properties may have more than one failure or corrections and it may take time to get completed. Once completed, an inspector must confirm the corrections before the rental property is issued a Certificate of Compliance. Due to inspection operations being suspended during the pandemic, the number of inspection failures are much lower than previous years. The top 10 RRIO inspection failures and frequency in 2020 are in the table below.

<b>RRIO Checklist Item</b>	<b># of Failures</b>
*3.3.a Smoke alarms are missing, not functional, or not installed inside of all sleeping rooms.	119
*1.4.e Exterior Stairs: Handrails/intermediate rails on any flight with more than three risers are missing, loose, or broken.	109
*3.3.d Carbon monoxide alarms are missing, not functional, or not installed in a central location outside each sleeping area and on every level of the home. Note: Carbon monoxide alarms should not be located within 15 feet of fuel burning appliances.	97
*2.3.d Handrails/, including approved intermediate rails or other guards on any surface 30 inches or more above adjacent walking surfaces, on any flight with more than three risers are missing, loose, broken, not graspable or otherwise unsafe.	57
*1.4.d Exterior Stairs: Guardrails/intermediate rails on any landing, deck, or platform that are 30 inches or more above grade or other surfaces are missing, loose, or broken.	50
*6.2 Any electrical equipment (meter bays, service panel, subpanels, shutoff) is improperly installed or connected, tampered with, or unsafe.	48
*3.3.b Smoke alarms are missing, not functional, or not installed in a central location outside all sleeping rooms.	47
*6.1 Exposed unprotected wiring is evident in any room.	38
*3.2.b Any entrance door, including sliding doors, to housing unit or single-family dwelling does not have at least one operable dead bolt or deadlatch openable from the inside without a key or other approved locking device.	22
*3.3.c Smoke alarms are missing, not functional, or not installed on each floor, including basements.	20

Missing or nonfunctional smoke alarms and CO alarms were among the most common failures in 2020. Failing this item is usually a problem that is more significant than a missing or dead battery. Before an inspection, inspectors usually encourage property owners to bring spare batteries to the inspection. Missing or inappropriately constructed handrails and intermediate guards (such as balusters) on both interior and exterior stairs and platforms have also consistently been one of the most frequent reasons a property does not pass RRIO. This is mainly driven by single-family and accessory dwelling units in older housing stock throughout the City.

A complete table of inspection results is in Attachment A.

### **C. The extent to which additional RRIO inspections have occurred as a result of code compliance violation or failure of a RRIO inspection**

Since 2017, RRIO has had the tools to require additional inspections when there is evidence of more wide-spread safety or maintenance problems on a property. In 2019, Council passed Ordinance 125851, and the RRIO program implemented changes to receiving and processing private inspection results. The City no longer receives and reviews private inspection results for rental properties that have 100 percent of units inspected by a private inspector. RRIO still requires private inspection results to be submitted to the RRIO program auditor for review if a unit or property fails the checklist for rental properties that do not have 100 percent of units inspected. The RRIO program auditor reviews the rental properties where only a sample of units are inspected and applies criteria to determine whether the reported failures indicate systemic or building-wide problems and, if so, selects additional units for inspection.

Like all aspects of the RRIO program, auditing numbers were impacted due to the paused inspection operations from the COVID-19 pandemic. Based on 59 private inspection results that were audited, reported conditions met the applicable criteria and triggered RRIO inspections of 19 additional units at 7 multi-unit properties.

In 2020, 38 units were selected for RRIO inspections based on 2 complaints from the public under the Housing and Building Maintenance Code.

### **D. Whether the fees associated with the program actually reflect program costs**

Registration and renewal fees are the primary source of funding for the RRIO program. The two-year registration and renewal fee is \$70 per property, including the first unit, and \$15 for each additional unit. Properties are required to renew their registration every two years. During the COVID-19 pandemic, customers were still able to register and renew rental properties online and through the mail.

Inspection fees are the second largest source of revenue for the RRIO program. These fees are \$175 for the property, including the first unit, and \$35 for each additional unit inspected. These fees are only collected on properties selected for inspection when a property owner chooses to use a City inspector (as opposed to a private inspector). The inspection fees are reviewed annually. RRIO has not requested a change to the inspection fee since 2018, but plans to request an increase to the inspection fee for 2023 due to increasing labor costs.

The program also has fees for private inspector registration and training, private inspector filing fees, late registration fees, late inspection fees and the program retains a portion of civil penalties collected. These sources do not generate significant program revenue.



Like all parts of the RRIO program, the COVID-19 pandemic affected RRIO revenues. For the health and safety of our customers and city staff, the RRIO program suspended inspection operations in March 2020, thereby eliminating planned inspection fee revenue. Customers were still able to register and renew rental properties online to keep revenue coming in. However, during the pandemic, RRIO saw a decrease in total registrations but the total number of units registered stayed relatively stable. The decline in registered rentals may be attributed to more rental properties being sold and becoming owner-occupied or it might be that some landlords simply decided not to renew their registrations during the pandemic. SDCI also slowed down enforcement of registration and renewal requirements during the pandemic, which may account for some of the decrease in registered properties.

The RRIO program took offsetting actions to reduce expenses, including allowing vacant positions to go unfilled and redeploying inspection staff to other work. The program also used the pause in inspections to make improvements to the IT system, the inspection checklist, and staff training.

The RRIO program expects revenues to improve with inspection operations resuming in late summer 2021. Furthermore, the RRIO fee model projects higher revenues in 2021 as the first properties on the two-year registration cycle are due to renew, combined with continuing renewals on the previous five-year cycle. SDCI will examine the overall RRIO budget early 2022 as part of the annual budget process and determine if any fee or other financial changes need to be made.

RRIO's revenue and expenses for 2020 were:

	<b>2020</b>
RRIO Program Revenue	\$1,083,152
RRIO Program Expenses	(\$1,871,364)
<b><i>Annual Net before Set-Asides, Financing, Interest</i></b>	<b><i>(\$788,212)</i></b>
RRIO Set-Asides, Financing & Interest	(\$181,752)
<b><i>Annual Net</i></b>	<b><i>(\$969,963)</i></b>

**E. The number and type of code compliance complaints that have occurred on properties registered with the RRIO program**

In 2020, SDCI opened 313 code compliance cases on registered properties. These cases covered a broad range of issues, including housing conditions, tenant-landlord issues, weeds, junk storage, and building without a permit. SDCI used RRIO authority to inspect an additional 38 units based on 2 complaints of code violations of the Housing Building Maintenance Code.

It's difficult to draw any conclusions from the fact that some registered properties have subsequent code compliance complaints. Many complaints have nothing to do with rental housing conditions. With respect to property conditions, RRIO registration requires a self-declaration by the property owner

that the property meets the RRIO standards and property owners may not be fully aware of unit conditions. Also, there can be a significant time lag between registration or a RRIO inspection and a complaint. Currently this lag can be nearly five years. Even so, code violations may occur regardless of when the inspection or assessment was made.

**F. The extent to which the civil warrant process has been used**

To date, the RRIO program has not needed to seek a civil warrant.

**G. The extent to which audits of private qualified rental housing inspectors have occurred and any related findings**

In 2019, Council passed Ordinance 125851, and the RRIO program implemented changes to receiving and processing private inspection results. The City no longer receives and reviews private inspection results for rental properties that have 100 percent of units inspected by a private inspector. RRIO still requires private inspection results to be submitted to the RRIO program auditor for review if a unit or property fails the checklist for rental properties that have a sample of units inspected (usually 20 percent). The RRIO program auditor can then review those results and apply criteria to select additional units for inspection.

In 2020, 59 private inspection results were audited. Based on reported conditions, the RRIO auditor triggered and expanded RRIO inspections of 19 units at 7 multi-unit properties.

RRIO requires inspectors to leave behind an inspection results and feedback form for tenants. In 2020 and due to the COVID-19 pandemic, only 16 feedback responses were received and no audit inspections were requested by tenants. Overall and in past years, feedback has been favorable regarding the RRIO program and most inspectors.

The table below summarizes the RRIO auditing program and results for 2020. Like all aspects of the RRIO program, auditing numbers were impacted due to the paused inspection operations from the COVID-19 pandemic.

Audit Element	Results
Audit failing inspection results from private inspectors. Pick additional units for inspection when appropriate.	59 inspection results were audited in 2020. 19 units were picked for additional inspections at 7 multi-unit properties. Zero properties were pre-emptively inspected at 100%.
Tenant feedback from leave-behind reports.	16 feedback responses were received, resulting in zero audit inspections at the tenant’s request.

<p>Access properties and units previously inspected by private inspectors to audit their conclusions.</p>	<p>2 properties required inspections of 100% of available rental units or an additional 38 units as a result of expanded RRIO inspections based on Housing complaints.</p> <p>Both properties were previously inspected by a City inspector – one in 2015 and one in 2016.</p> <p>No indication of inspector misconduct was found.</p>
<p>Follow up with private inspectors to verify work was done and ask other questions about how inspections are going.</p>	<p>Frequent, ongoing communication with private inspectors through email, face-to-face meetings, and phone calls. Approximately 12 corrective email contacts were initiated with private inspectors.</p>
<p>SDCI tracking and follow up on complaints about private inspectors.</p>	<p>In 2020, the RRIO auditor received 1 inquiry or complaint regarding private inspectors. Zero complaints resulted in an audit inspection. An audit inspection was offered, but was refused by the property owner.</p>
<p>SDCI authority to revoke RRIO private inspector certification for cause.</p>	<p>So far, there has been no occasion to revoke a private inspector certification.</p>

**OTHER ACCOMPLISHMENTS**

The RRIO program had several other notable accomplishments in the last year:

**COVID-19 Response**

With the onset of the COVID-19 pandemic, the RRIO program was required to make major adjustments in order to follow public health guidance and protect the health and safety of RRIO staff and customers. Due to the ongoing public health crisis, the program stopped selecting properties for inspection beginning in March 2020. The program also extended inspection due dates for properties already selected for inspection. For renewals, the program offered compliance due date extensions for property owners citing COVID-19-related hardships. Follow-up compliance for failure to complete an inspection or renewal was also slowed, however significant violations were prioritized and the program continues to receive complaints and track non-compliance. With the positive vaccine rollout and lifting of public health restrictions, the RRIO program is working towards resuming inspection operations and ramping enforcement activity back up in August 2021. The program’s intention is to catch up with inspections, renewals, and compliance actions which will likely be a longer effort into 2022. The pandemic has affected overall program performance for inspections, registrations, and renewals in 2020 and for the program at large.

## Outreach

During the pandemic, the RRIO program was still able to do outreach virtually. Now that RRIO is an established rental program much of the general tenant and landlord outreach has been incorporated into the broader “Renting in Seattle” tenant and landlord resource program. Additionally, RRIO used the email distribution list of nearly 19,000 landlords or property managers to share information of interest to rental property owners during the pandemic.

RRIO also maintained its ongoing core outreach tools, including:

- Direct mail to newly discovered likely rental property owners, including notification letters, reminder letters and warning letters;
- A comprehensive website at [www.seattle.gov/RRIO](http://www.seattle.gov/RRIO) that is consistently updated to ensure relevant policy and information changes;
- Two brochures – one with general program information, one focused on inspections and directed primarily at renters - translated into 13 languages other than English;
- Partnerships with property owner associations to help get the word out to their membership; and
- A video narrated in 11 languages that discusses the inspection aspect of the RRIO program, with a focus on tenants and how inspections will impact them.

## Race and Social Justice Initiative

RRIO built a number of community outcomes or goals based on Race and Social Justice (RSJ) principles into program design and implementation. The overall goal is to eliminate substandard rental housing, which particularly affects people of color, low-income people, and other historically underrepresented communities. During the pandemic, the RRIO program was still able to:

- Include RRIO messaging in broader inclusive outreach through the *Renting in Seattle* initiative to tenants and landlords conducted with the advice and assistance of the Department of Neighborhoods (DON) Community Liaisons (CLs) who represent non-English speaking and historically underrepresented communities. Renting in Seattle virtual outreach efforts included two online webinars, one of which is poised to be adapted into an ongoing education video series.
- Continued distribution of the main RRIO program brochure in 13 languages besides English and distribution of translated brochures to locations which serve non-English speaking communities.

- Continued a cultural competency component in the private inspector training to help prepare private inspectors to work with all Seattle communities. The RRIO program was able to complete the annual private inspector training in January 2020 just prior to the outbreak of COVID-19.

## **2022 PRIORITIES**

### **COVID-19 Recovery**

With the lifting of public health restrictions, the RRIO program is working towards resuming inspection operations in August 2021. RRIO inspections will phase in due to staff limitations and fluctuating safety requirements. For a short period of time, RRIO will allow customers who are still uncomfortable with allowing an inspector in their home for the RRIO inspection to postpone the inspection requirement for a few months. In fall of 2021, the RRIO program expects to ramp enforcement activity back up. The program's intention is to catch up with inspections, renewals, and compliance actions which will likely be a longer effort into 2022.

### **Re-inspections**

In 2020, the RRIO program was supposed to begin re-inspections but due to the COVID-19 pandemic, inspection operations were halted. This means that the RRIO program has not yet begun selecting properties for re-inspection but with inspection operations commencing again in late 2021, re-inspections will be a part of that process. Since inspections have been going on for over 5 years, at least 10% of properties that completed the inspection requirement in the first few years of the program will be randomly selected a second time for a re-inspection as required under RRIO. The program will incorporate the re-inspection requirement into the inspection noticing process. Just like the initial inspection requirement, property owners will be noticed by mail and email to let them know they will need to meet the re-inspection requirement. Property owners will have 60 days to meet the inspection requirement due date or reach out to the program to request an extension due to extenuating circumstances or additional time needed to complete repairs.

### **RRIO Online System Enhancements**

Since the beginning of the RRIO program, the Accela IT system has been used to manage online registration and track program work. Fee changes, the beginning of renewals, and the integration of other City programs through Accela require IT system enhancements. In late 2021, staff will begin work to incorporate re-inspections into the inspection noticing algorithm and process. RRIO is also pursuing other large-scale system enhancements to provide customers with a better and more intuitive user experience. RRIO business process flows suggest that the process is relatively straightforward: submit application, pay fee, get approved. However, RRIO customers using the online system continue to struggle with finding their existing records, paying fees, and just navigating within the Seattle Services

Portal. RRIO users tend to be infrequent portal users and may only visit Portal once a year to update information or every two years to renew. The RRIO program has been working with Seattle IT and SDCI's Accela Enhancements IT consultant team to analyze the IT issues that RRIO customers encounter with the program.

### **Managing RRIO Compliance**

The RRIO program will seek to improve enforcement and compliance for unregistered rental properties in 2022. The number of unregistered properties is unknown. Currently the program identifies unregistered properties through complaints. RRIO is looking at IT system and process improvements for the enforcement process. The program is also looking into the use of King County assessor data and third-party vendor sources to identify unregistered properties. The feasibility of accurately identifying unregistered rental properties using data analysis is uncertain.

### **Inspection Checklist Clarifications**

The RRIO program is in the process of making clarifying amendments to the inspection checklist. The program consulted with City and private inspectors about points of confusion in the checklist and clarified the requirements for items such as guardrail height, intermediate rails (e.g., balusters), safe outlets near sinks, and egress windows. The changes will be promulgated through a revised Director's rule and SDCI will conduct training for City and private inspectors on the clarified inspection requirements.

### **CONTACT**

Geoff Tallent  
Rental Programs Manager  
Seattle Department of Construction and Inspections  
(206) 684-8452  
[Geoff.tallent@seattle.gov](mailto:Geoff.tallent@seattle.gov)  
[www.seattle.gov/RRIO](http://www.seattle.gov/RRIO)

## ATTACHMENT A

### RRIO Checklist Failures – 2020

ITEM TEXT	Count
*1.1.a Roof has holes and/or structural member is broken or decayed.	0
*1.1.b Roof is not weather-proof or has clear evidence of leaking.	2
*1.2.a Chimney: Loose bricks at the top and/or masonry requires repointing at top.	0
*1.2.b Chimney: Loose or missing bricks or masonry in middle or at chimney base.	0
*1.3.a Standing water in crawl space.	1
*1.3.b Foundation is failing: leaning, crumbling, missing pieces, broken, or deflected.	0
*1.4.a Exterior Stairs: Structural members are leaning, decayed, detached or are otherwise unsafe	3
*1.4.b Exterior decks or other platforms have broken, loose, decayed, missing pieces, or are otherwise unsafe.	12
*1.4.c Exterior stairs have broken, loose, decayed, or missing pieces, or are otherwise unsafe.	7
*1.4.d Guardrails, including approved intermediate rails or other guards, on the open sides of on any landing, deck, or platform that are 30 inches or more above grade or other surfaces are missing, loose, broken or are otherwise unsafe.	50
*1.4.e Handrails, including approved intermediate rails or other guards on any open side 30 inches or more above grade, on any flight with more than three risers are missing, loose, broken, not graspable or otherwise unsafe. Note: Graspable configurations can be found online at: <a href="http://www.seattle.gov/DPD/Publications/CAM/cam319.pdf">www.seattle.gov/DPD/Publications/CAM/cam319.pdf</a>	109
*1.5.a Weather stripping is missing or allowing air to enter.	5
*1.5.b Sills or frames have decayed wood or separated joints.	1
*1.5.c Windows or doors have missing pieces or are cracked and allowing water or weather penetration (e.g., seeping water, leaking air, coming in through a crack or hole)	16
*1.5.d Any openable window within 10 feet of grade or above any deck, balcony or porch is missing latch or has defective latching device.	5
*1.6.a Exterior walls allow water or weather penetration (e.g., seeping water, leaking air, coming in through a crack or hole)	2
*1.6.b Exterior wall is failing: leaning, crumbling, missing pieces, broken, or deflected.	3
*2.1.a Any habitable room, bathroom, or laundry room does not have the required openable windows, passive or mechanical ventilation.	5
*2.1.b Kitchen fan, if used in place of openable windows, is not operable or pulling air.	2
*2.1.c Bathroom and laundry room fan, if used in place of openable windows or operable passive ventilation, is not operable, pulling air, or vented to exterior.	3
*2.1.d Clothes Dryer ducts are detached, leaking, damaged, not vented to the exterior or otherwise restricting airflow.	1
*2.2.a Wall, floor, or ceiling coverings are damaged or broken such that the opening creates an unsafe condition. Examples include but not limited to exposed framing members, exposed electrical components, exposed plumbing, access for rodents and insects, or other unsafe conditions.	18
*2.2.b Walls, floors, or ceilings are soft, spongy, or wet to the touch.	5
*2.2.c Interior load-bearing walls are not maintained in a safe and sound condition.	0
*2.2.d Floors and any support system is not maintained in a safe and sound condition	0
*2.3.a Joists or posts are leaning, decayed, or detached or are otherwise unsafe.	0
*2.3.b Landings or other platforms have broken, loose, decayed, missing pieces, or are otherwise unsafe.	1
*2.3.c Interior stairs have loose, broken, decayed, missing pieces, or are otherwise unsafe.	7
*2.3.d Handrails/, including approved intermediate rails or other guards on any surface 30 inches or more above adjacent walking surfaces, on any flight with more than three risers are missing, loose, broken, not graspable or otherwise unsafe. Note: Graspable configurations can be found online at: <a href="http://www.seattle.gov/DPD/Publications/CAM/cam319.pdf">www.seattle.gov/DPD/Publications/CAM/cam319.pdf</a>	57
*2.3.e Guardrails/, including approved intermediate rails or other guards, on any landings, or platforms that are 30 inches or more above adjacent walking surfaces are missing, loose, broken, or otherwise unsafe.	18
*2.4.a Lead paint - any room constructed before 1978 with peeling, chipped, or otherwise deteriorated paint exceeding two square feet or 10% of any component such as a window assembly, including frame and sill, or door frame. Note: To	1

correct this condition property owner must demonstrate that the painted repair was made by a Washington State Lead Safe Certified contractor or provide documentation that there is no lead hazard present.

*2.4.b Potential asbestos-containing materials - damaged components, such as wrapped or insulated piping or ducts, ceiling and floor finishes, or siding that may contain asbestos.	0
*3.1.a Emergency escape window or door is missing, blocked, or inaccessible.	0
*3.1.b Emergency escape windows do not meet size or sill height requirements.	11
*3.1.c Security bars, grills or similar devices on emergency escape windows are not openable or have inoperable release mechanisms.	0
*3.2.a Any entrance door, including sliding doors, to a housing unit or single-family dwelling is not capable of resisting forcible entry or damaged to the extent that the door or the door casing is otherwise unsafe.	6
*3.2.b Any entrance door, including sliding doors, to housing unit or single-family dwelling does not have at least one operable dead bolt or deadlatch openable from the inside without a key or other approved locking device.	22
*3.2.c The main entrance door to housing unit or single-family dwelling does not have an observation port, window in the door, or side light window. Observation ports shall be installed at a height of not less than 54 inches and not more than 66 inches from the floor.	14
*3.3.a Smoke alarms are missing, not functional, or not installed inside of all sleeping rooms.	119
*3.3.b Smoke alarms are missing, not functional, or not installed in a central location outside all sleeping rooms.	47
*3.3.c Smoke alarms are missing, not functional, or not installed on each floor, including basements. Note: Not required in crawl spaces and uninhabitable attics.	20
*3.3.d Carbon monoxide alarms are missing, not functional, or not installed in a central location outside each sleeping area and on every level of the home. Note: Carbon monoxide alarms should not be located within 15 feet of fuel burning appliances.	97
*3.4.a Exterior building entrance doors, except entrance doors which open directly into a single housing unit, shall be self-closing, self-locking, and equipped with a deadlatch or other approved locking device.	3
*3.4.b Stairway enclosure doors do not self-close and latch.	1
*3.4.c Exit doorway and change of direction of a corridor is missing a well-lighted exit sign or placard that is illuminated in the event of power supply failure.	1
*3.4.d Interior fire-resistant walls and ceilings or corridors in apartment buildings are compromised by cracks, holes, or loose or broken plaster, not maintained in a safe and sound condition, or their fire resistance has been otherwise compromised.	0
*3.4.e Any door to a storage, maintenance, laundry, or building service room accessible by tenants is not self-closing and self-locking and is not openable from the inside without a key.	2
*4.1 Dwelling unit does not have at least one habitable room that is 120 square feet (square footage requirements do not apply to units comprised of a single habitable room such as a Single Room Occupancy, rooming house, or micro-housing unit).	0
*4.2 Any habitable room except the kitchen measures less than seven (7) feet in any floor dimension.	0
*4.3 Any sleeping room measures smaller than 70 square feet in size.	0
*5.1.a Heat source in the unit is permanent, working, and in good repair. Required permanently-installed heating equipment/device is defective or missing.	5
*5.2.a Temperature can be maintained at a minimum of 68 F when exterior temperature is 24 F or higher. Permanently-installed heater is not capable of maintaining required temperature in any habitable room or bathroom.	1
*5.3 Fuel-burning appliances, where allowed, must be of an approved type, properly installed, and maintained in good working order.	0
*5.3.a Unvented portable fuel-burning heater is present in a sleeping room or bathroom	0
*5.3.b Any gas, wood, or fuel-burning heat source lacks proper ventilation or is not properly isolated from a sleeping area.	0
*6.1 Exposed unprotected wiring is evident in any room.	38
*6.2 Any electrical equipment improperly installed or connected, tampered with, or unsafe, including but not limited to meter bays, service panels, subpanels, or main disconnect.	48
*6.3 Any habitable room does not have an operable light fixture and an electrical outlet, or two electrical outlets. Any kitchen does not have an operable light fixture and three operable outlets, one of which may serve an installed cooking range.	1
*6.4 Any bathroom, laundry room, utility room, common hallway, stairway, or porch does not have an operable light fixture.	2



*6.5 Any electrical extension cord used for permanent extension of power in place of approved installed wiring. An improper extension cord use may include: (1) running the cord through doors, doorways, halls, windows, cabinets; (2) concealed extension cords within walls, floors, or ceilings; (3) cords installed on walls and ceilings; or (4) otherwise unsafe.	3
*7.1 Running water temperature is below 100°F.	2
*7.2 Any individual unit water heater is set above 120°F.	4
*7.3 Evidence the plumbing system is not connected to an approved sewer or a potable water source, or is not in good working order. Evidence includes, for example: (1) strong sewer gas smell in the basement, crawlspace or outside of unit; (2) leaking of basement plumbing pipes; (3) clogged or very slow drains; (4) flexible traps or other improper piping; or (5) otherwise unsanitary.	20
*7.4 Visual evidence that a pressure temperature relief valve on a hot water heater is missing, not installed properly, has been tampered with, the relief valve is dripping, or is otherwise unsafe.	12
*8.1 Bathroom does not include a fully functional sink, toilet, and tub or shower.	3
*8.3 Tight-fitting door missing if bathroom is in a food preparation area.	0
*8.4 Toilet does not flush, is broken, leaks at the base, or is not secure to the floor.	13
*8.5.a. Sink: Dripping faucets, cracked or chipped porcelain, slow drain, or broken but operable handles or knobs.	4
*8.5.b. Sink: Is not operable such as cracked through, faucet cannot turn on, or no hot and cold water.	0
*8.5.c. Under sink plumbing pipes or connectors are leaking.	6
*8.6.a Shower or bathtub: Dripping faucets, cracked or chipped porcelain, slow drain, broken but operable handles or knobs.	6
*8.6.b Shower or bathtub: Is not operable such as cracked through, faucet cannot turn on, or no hot and cold water.	1
*8.6.c Shower or bathtub: Plumbing pipes or connectors are leaking.	0
*8.7 Bathroom Counter is missing tile, pieces are broken, is made of a porous material, or is pulling away from the wall.	0
*9.1 Dwelling unit does not have a kitchen which must include sink, counter, and cabinets, as well as a cooking appliance, and refrigerator or space and approved hookups for the appliances.	0
*9.2 Kitchen: Counter is missing tile, pieces are broken, is made of a porous material, or is pulling away from the wall.	1
*9.4.a Cooking appliance: One or more parts are inoperable or missing but appliance still has food cooking capability.	0
*9.4.b Cooking appliance: Not rated for indoor use or entire appliance is inoperable.	0
*9.5.a Kitchen sink: Dripping faucets, cracked or chipped porcelain, slow drain, or broken but operable handles or knobs.	3
*9.5.b Kitchen sink: Not operable such as cracked through, faucet cannot turn on, or no hot and cold water.	0
*9.5.c Kitchen: Under sink plumbing assemblies including any piping, faucet risers, traps, or sink connectors are leaking.	4
*10.1 Garbage/rubbish is accumulated outside of trash receptacles.	0
*10.2 Visible evidence of rodents or insects such as bedbugs, ants, cockroaches, or silverfish. Note: documentation issued by a certified exterminator or a certified fumigator is sufficient to pass this item in the following cases: (1) the documentation confirms the existing treatment program is appropriate and following the recommended treatment plan; (2) documentation of a new or expanded treatment program and at least one treatment performed following the new or expanded treatment program; or (3) documentation that there are no pests present.	1