



# Memo

**Date:** March 21, 2023  
**To:** Seattle City Councilmembers  
**From:** Nathan Torgelson, Director Seattle Department of Construction and Inspections  
**Subject:** Rental Registration and Inspection Ordinance Annual Report

---

Attached, please find the 2022 Rental Registration and Inspection Ordinance (RRIO) Annual Report. This report is submitted as required by Ordinance 124011 Section 17, as amended by Ordinance 125343.

In 2022, the RRIO program focused on emerging from the disruptions 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. Inspections resumed in August 2021, with a second short suspension in early 2022 when the COVID Omicron variant spiked. Customers remained able to register and renew rental properties online throughout the public health emergency declaration. Despite this, property registration renewals dropped significantly during that time.

- At the end of 2022, a total of 26,519 properties representing 161,384 rental units were registered. During 2022, RRIO saw a continued decrease in registrations with the RRIO program. Possible explanations for the decrease are explained in the report.
- Over the course of the year, the RRIO program issued 11,042 property registration renewals and new registrations.
- In 2022, 1,939 properties completed and passed the inspection requirement. This amounted to inspections of 7.3% of the total registered properties – somewhat short of the 10% target due to a COVID-related suspension of inspection in the first months of 2022.

Please 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)

2022 Annual Report to the City Council

March 2023



**Seattle** Department of  
Construction & Inspections

## 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

In 2022, the RRIO program focused on emerging from the disruptions 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. Inspections resumed in August 2021, with a second short suspension in early 2022 when the COVID Omicron variant spiked. Customers remained able to register and renew rental properties online throughout the public health emergency declaration. Despite this, property registration renewals dropped significantly during that time. Below are RRIO program highlights for calendar year 2022.

- At the end of 2022, a total of 26,519 properties representing 161,384 rental units were registered.
- During 2022, RRIO continued to see a decrease in registered properties from the peak of 33,691 properties in 2019. However, the number of registered units rebounded to pre-pandemic levels. 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 neglected or declined 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. The enforcement slowdown was a result of staffing vacancies and redeployments during the pandemic.
- SDCI began a push to catch up on enforcement in the fall of 2022. By the end of the year, the program sent out 1,565 warnings for overdue registrations and renewals.
- Over the course of 2022, the RRIO program issued 11,042 property registrations and renewals.
- The program collected \$1,826,999 fees in 2022, which was below the projected \$2,195,937. This was almost entirely due to 4,960 fewer registration renewals than projected.
- In 2022, 1,939 properties completed and passed the inspection requirement. This amounted to 7.3% of registered rental properties completing an inspection. The number of RRIO inspections was below the target of inspecting 10% of properties due to a suspension of inspections during the first months of 2022 due to the Omicron COVID variant outbreak.

- In late 2022, SDCI updated all RRIO program public communication materials, letters, and forms to reflect a new additional 5% technology fee that went into effect beginning 2023. SDCI communicated the fee changes with the customers via an email list serve.

## **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. All rental properties must be inspected at least once every 10 years, either by qualified private inspectors or with SDCI inspectors who complete the work as a fee-based service. 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 Mayor's executive order 2020-03, 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. Registration and renewals continued 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, focusing primarily on the most significant violations. In addition, the program continued to receive complaints and track non-compliance. Program performance for inspections, registrations, and renewals declined significantly in 2020 and that decline carried through into 2021.

Over the course of 2022 the RRIO program largely returned to pre-pandemic operations. In December 2021 when the Omicron COVID variant emerged, the program instituted a brief second pause in

inspections. The program re-resumed inspections in March 2022 and resumed pre-pandemic inspection amounts by mid-2022. The program stepped up registration and renewal enforcement in fall of 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 2022, a total of 26,519 properties were registered. Total registrations decreased by 2% from 2021 (loss of 567 registrations with the program). This was a less significant loss than the 6% decrease between 2020 and 2021. Registered units within the properties rebounded to 161,384 – an increase of 12,285 units or 8% over 2021. 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 neglected to, or 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. The enforcement slowdown was largely a result of staffing vacancies and redeployments during the pandemic. The increase in total number of registered units was likely 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. The slowing decline of property registrations and the rebounding of units may also be the result of stepped up enforcement by the RRIO program beginning in fall 2022.

Over the course of the year, the RRIO program issued 11,042 property registrations and renewals. 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, field observations, and larger properties that required minimal research to show they were rentals. For non-compliant property owners, RRIO mailed warning letters and Notices of Violations (NOVs) to prompt unresponsive property owners to register. Enforcement on unregistered rentals picked up in the fall of 2022 as COVID limitations lifted.

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

Inspection statistics for 2022 were:

Percent of registered properties that completed and passed an inspection in 2022	7.3%
Total number of properties that completed and passed the inspection requirement in 2022	1,939
Completed by Private Inspectors in 2022	1,226
Completed by City Inspectors in 2022	671
Completed by Alternate Means (such as HUD inspection) or a combination of inspection types	19
Completed by Mixed Inspection (Use of both City Inspector and Private Inspector)	23

During the COVID-19 pandemic there was not a way to safely complete in-person, in-home RRIO inspections consistent with public health directives. Inspections were suspended in 2020, resumed in late 2021, and then were suspended again through March of 2022 during the outbreak of the Omicron COVID variant. After March, the RRIO program ramped back up to pre-pandemic inspection levels. Because of the early 2022 inspection suspension, the RRIO program achieved 7.3% of the target of inspecting 10% of properties. To date, the RRIO program has had 17,475 properties or 66% of registered properties complete the inspection requirement.

With the resumption of inspections, the RRIO program started the first “re-inspections.” The RRIO ordinance requires that 10% of properties that had already completed the inspection five or more years ago are randomly selected a second time for a re-inspection. The RRIO program did not meet the 10% requirement due to inspections on hold for the first part of 2022.

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 bring the property into compliance with the RRIO checklist standards. Rental properties may have more than one failure or correction 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.

The top 10 RRIO inspection failures observed by City inspectors and the frequency in 2022 are in the table below. Note that this does not include the results of inspections performed by qualified private inspectors, who are not required to submit detailed inspection results in most cases. Rather, private inspectors most often are required to submit the final passing Certificate of Compliance. From communication with private inspectors, the RRIO program understands they see similar trends.

RRIO Checklist Item	# of Failures
*6.2 Any electrical equipment is improperly installed or connected, tampered with, or otherwise unsafe, including but not limited to meter bays, service panels, subpanels, main disconnect, and receptacle outlets within 3 ft. of water that are not ground fault interrupter (GFI) style or GFI protected circuit.	518

*3.3.a Smoke alarms are missing, not functional, or not installed inside of all sleeping rooms.	400
*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.	236
*3.3.b Smoke alarms are missing, not functional, or not installed in a central location outside all sleeping rooms.	133
*1.4.e Handrails, including 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, missing return, or otherwise unsafe.	127
*2.3.d Handrails/, including 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, missing return, 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>	119
*1.4.d Guardrails, including intermediate rails or other guards, on the open sides of any landing, deck, or platform that are 30 inches or more above grade or other surfaces are missing, loose, broken or are otherwise unsafe. Note: Intermediate rails must be no more than 4 inches apart. Every guardrail shall be at least 36 inches in height unless it is an existing guardrail that was in compliance with the standards in effect at the time the guardrail was constructed, is in good condition, and is between 28 and 42 inches in height.	102
*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.	85
*6.1 Exposed unprotected wiring is evident in any room.	67
*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.	62

Improperly installed electrical equipment was the most common failure in 2022. This became a common failure with an addition to the RRIO inspection checklist requiring ground fault interrupter (GFI) outlets next to sinks. GFI protected circuits are a critical life-safety protection. They are usually easy to install, including retrofitting older construction. Missing or nonfunctional smoke alarms and CO alarms was also a common failure. 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.

A complete table of City 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, the RRIO program has had the option 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.

In 2022, SDCI required 330 additional units to be inspected at 47 multi-unit properties based in the inspection results submitted by private inspectors. SDCI inspectors identified conditions that warranted additional RRIO inspections in 124 units at 7 multi-family properties.

### **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. The annual base fee cost of \$35 for registration and renewal has not changed since program inception in 2014. The fee for additional units was increased in 2019 and has not changed since. A planned 2022 fee increase was put on hold due to the COVID-19 pandemic.

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 were last changed in 2019. Subsequent planned fee increases were put on hold during the COVID-19 pandemic.

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.

The significant drop in RRIO registrations that occurred simultaneously with the COVID-19 pandemic has greatly affected RRIO revenues. The registration forecast made as part of the 2019 fee update projected 4,960 more registrations and renewals in 2022 than were received. The below-forecast registration and renewals closely correspond with revenues that came in below projections. The decline in registered

rentals over the last 2-3 years has been a challenging question for the program, with no clear single explanation. It may be attributed to more rental properties being sold and becoming owner-occupied or it might be that some landlords neglected to, or 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.

During the suspension of inspections, the RRIO program took offsetting actions to reduce expenses, including allowing vacant positions to go unfilled and redeploying inspection staff to other work. In 2022, the program staffed back up. With full staffing, program expenses were 4% higher than forecast, largely due to increasing labor costs.

RRIO's revenue and expenses for 2022 were:

	<b>2022</b>
RRIO Program Revenue	\$1,826,999
RRIO Program Expenses	(\$2,343,707)
<b><i>Annual Net before startup payback and debt service</i></b>	<b><i>\$(516,708)</i></b>

The net loss in revenue will be applied to the RRIO fund balance, that includes unrecouped startup costs. In 2021 RRIO partially paid down startup costs. SDCI is evaluating the need to adjust fees in line with current expenditures and needs.

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

In 2022, SDCI opened 242 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.

It's difficult to draw 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 RRIO registration or inspection and a subsequent complaint. Nevertheless, a code violation 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 2022, 415 private inspection results were audited. Based on reported conditions, the RRIO auditor triggered and expanded RRIO inspections of 330 units at 47 multi-unit properties. These numbers represent a return to pre-pandemic auditing.

RRIO requires inspectors to leave behind an inspection results and feedback form for tenants. When issues are raised by tenants, the RRIO auditor follows up to determine if a problem occurred and offer a follow-up auditing inspection. In 2022, 19 feedback responses were received, and no significant issues were raised or audit inspections requested by tenants.

The table below summarizes the RRIO auditing program and results for 2022. 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.	415 inspection results were audited. 330 units were picked for additional inspections at 47 multi-unit properties.
Tenant feedback from leave-behind reports.	19 feedback responses were received
Access properties and units previously inspected by private inspectors to audit their conclusions.	SDCI had no access to units previously inspected by a private inspector in 2022. In past years, no indication of inspector misconduct was found.
Follow up with private inspectors to verify work was done and ask other questions about how inspections are going.	Frequent, ongoing communication with private inspectors through email, face-to-face meetings, and phone calls. Approximately 25 corrective email contacts were initiated with private inspectors.
SDCI tracking and follow up on complaints about private inspectors.	In 2022, the RRIO auditor received no inquiry/complaints regarding private inspectors.
SDCI authority to revoke RRIO private inspector certification for cause.	So far, there has been no occasion to revoke a private inspector certification.

## OTHER ACCOMPLISHMENTS

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

### Post-COVID-19 Civil Emergency Recovery

The RRIO program emerged from two years of significant disruptions due to the COVID-19 Civil Emergency. Over the course of 2022, the RRIO program returned to full staffing, reduced remote work, fully resumed inspections, and stepped-up enforcement (see more below).

### Enforcement Push

During much of the COVID-19 pandemic the RRIO program pursued limited enforcement due to staffing constraints and challenges communicating with customers. The program maintained enforcement for problem properties and larger properties which were clearly rentals. The RRIO program reinstated full late registration and renewal enforcement in the fall of 2022. This involved reassigning staff to coordinate enforcement, training new staff, and updating customer communications. The program developed a “front-of-the-line, back-of-the-line” approach, sending reminder/warning letters to all properties shortly after they go overdue for registration or renewal and also working forward from properties that went overdue during the pandemic. By the end of 2022, SDCI has sent 1,565 warnings for overdue registrations and renewals. The program also sent out 136 warnings for overdue inspections and over 100 notices to newly-discovered, likely-rental properties that were not registered.

### Loss of Registered Units

SDCI fielded multiple inquires and data requests about the types and numbers of rental housing in the City. As shown in the table below, there has been a significant drop in registered properties, most notably in single family and small rental properties.

Size Class	July 2018		May 2020		August 2022	
	Properties	Units	Properties	Units	Properties	Units
Single Unit	21174	21174	23853	23853	18740	18740
2 to 4 Units	5145	13529	5420	14156	4072	10678
5 to 20 Units	3239	30951	2824	27394	2536	24951
21 to 50 Units	877	27503	829	26069	805	25353
51 to 99 Units	286	20112	290	20482	307	21633
100 to 199 Units	155	21291	164	23108	169	23428
200+ Units	71	19869	87	25517	100	29110
<b>TOTAL</b>	<b>30947</b>	<b>154429</b>	<b>33467</b>	<b>160579</b>	<b>26729</b>	<b>153893</b>

(note: by the end of 2022, the total registered units had returned to earlier levels)

SDCI worked with OPCD, a small landlord stakeholder group, and consultants in 2022 to examine reasons behind the loss, with no clear answers. Possible factors are non-compliance with RRIO over the course of the pandemic, the development of small rental properties into fewer larger properties, and

the removal of smaller rental properties and especially single-family homes from the rental market. The RRIO program has been careful to state that current RRIO registration data cannot provide a complete picture of rental market characteristics due to the currently indeterminate rate of non-compliance.

### **Outreach**

Most RRIO outreach has been incorporated into the broader “Renting in Seattle” tenant and landlord resource program. Additionally, RRIO uses the email distribution list of nearly 19,000 landlords or property managers to share information of interest to rental property owners. Notably in 2022, the RRIO email list was used to provide information and resources related to the lifting of the City and State eviction moratoria, including rental and utility arrears assistance and information on changes in the eviction process.

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.

### **Virtual Private Inspector training**

In early 2022, SDCI piloted a virtual private Inspector training. This included an updated curriculum and electronic training materials developed while inspections were on hold. Four new private inspectors were trained and several existing private inspectors attended as a refresher. The updated curriculum and materials will continue to be used. Based on the success of the pilot, SDCI plans to use virtual or hybrid training for future private inspector trainings.

### **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. Toward that goal, RRIO:

- Included RRIO messaging in broader inclusive outreach through the *Renting in Seattle* initiative to tenants and landlords.

- 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.

### **5% Technology Fee**

In 2023, SDCI added a five percent technology fee to most SDCI fees, including RRIO fees. It's important to note, this fee is managed separately from RRIO and is not included in RRIO program financial accounting above. RRIO will indirectly benefit from the additional IT support the technology fee will fund in SDCI. Ahead of the new fee, the RRIO program updated all customer communications, including the website, mailings, self-service portal, forms, and infographics. The program also sent information about the new fee to the approximately 19,000 property owners and managers in the RRIO email list.

## **2023 PRIORITIES**

### **Post-COVID Inspection Catch Up**

After over two years of paused RRIO inspections, SDCI is behind on the RRIO targets of inspecting 10% of rental properties each year and 100% of properties by 10 years. In March 2022 the program returned to selecting a pre-COVID monthly number of properties for inspection. In 2023 SDCI will increase the number of inspectors assigned to RRIO and increase the number of inspections to catch up with the reduced inspections during the pandemic.

### **Managing RRIO Compliance**

The RRIO program will prioritize continued improvement in enforcement and compliance for unregistered rental properties in 2023. RRIO will continue with the current work of catching up on past overdue renewals and registrations. The program is bringing on temporary staff to help with property research, which is one of the biggest enforcement challenges; when a property does not renew a rental registration, we usually do not know why. The owner may not have received the renewal notice, there may be a new owner or manager, the property may no longer be a rental, or the owner may have purposely not renewed in protest. Each non-renewal requires research to determine the situation and initiate the proper follow up: removing non-rentals from the registry, updating contact information, or issuing a violation.

### **Workload and Revenue Study**

SDCI is updating the 2018 RRIO fee study with current expenses and updated registration forecasts that reflect the recent trends in registration. SDCI will evaluate the need to adjust fees in line with current expenditures and needs. The RRIO ordinance requires that RRIO be self-supporting, including past program costs.

### **Loss of Registered Units**

The RRIO program will continue to examine the reasons behind the loss of registered units. The loss has important implications for RRIO regulation and fees. It also may point to policy questions about the supply of rental housing stock. SDCI worked with OPCD, stakeholders, and consultants in 2022 to examine the loss and found no single explanation. As discussed above, it is likely the result of both the changing composition of Seattle’s rental housing supply and compliance with the RRIO program during the pandemic. SDCI is now working with the City Auditor’s Office on further examination of the loss, with a report expected in the fall of 2023. The compliance effort currently underway should reduce uncertainty about non-complaint properties.

### **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 – 2022

Checklist Item	Count of failures
*6.2 Any electrical equipment is improperly installed or connected, tampered with, or otherwise unsafe, including but not limited to meter bays, service panels, subpanels, main disconnect, and receptacle outlets within 3 ft. of water that are not ground fault interrupter (GFI) style or GFI protected circuit.	518
*3.3.a Smoke alarms are missing, not functional, or not installed inside of all sleeping rooms.	400
*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.	236
*3.3.b Smoke alarms are missing, not functional, or not installed in a central location outside all sleeping rooms.	133
*1.4.e Handrails, including 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, missing return, 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>	127
*2.3.d Handrails/, including 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, missing return, 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>	119
*1.4.d Guardrails, including intermediate rails or other guards, on the open sides of any landing, deck, or platform that are 30 inches or more above grade or other surfaces are missing, loose, broken or are otherwise unsafe. Note: Intermediate rails must be no more than 4 inches apart. Every guardrail shall be at least 36 inches in height unless it is an existing guardrail that was in compliance with the standards in effect at the time the guardrail was constructed, is in good condition, and is between 28 and 42 inches in height.	102
*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.	85
*6.1 Exposed unprotected wiring is evident in any room.	67
*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.	62
*2.2.a Wall, floor, or ceiling coverings are missing, 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.	54
*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. Side light window distance to door no more than 31 inches.	54
*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.	50
*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 operable from the inside without a key or other approved locking device.	38
7.2 Any individual unit water heater is set above 120 degrees Fahrenheit and missing safety straps.	35
*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)	33
*8.4 Toilet does not flush, is broken, leaks at the base, or is not secure to the floor.	27
*2.3.e Guardrails/, including 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. Note: Intermediate rails must be no more than 4 inches apart. Every guardrail shall be at least 36 inches in height unless it is an existing guardrail that was in compliance with the standards in effect at the time the guardrail was constructed, is in good condition, and is between 28 and 42 inches in height.	26
*2.1.a Any habitable room, bathroom, or laundry room does not have the required openable windows, passive or mechanical ventilation.	23
*8.5.b. Is not operable, broken, or otherwise unsafe, faucet cannot turn on, or no hot and cold water.	21
*3.1.b Emergency escape windows do not meet size or sill height requirements. Escape window opening not a minimum of 5.0 sq. ft. within 5 ft. of grade or 5.7 square feet if higher than 5 ft. above grade. (See above for full requirements.)	18
*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)	14

concealed extension cords within walls, floors, or ceilings; (3) cords installed on walls and ceilings; or (4) otherwise unsafe.	
*3.1.a Emergency escape window or door is missing, blocked, or inaccessible.	14
*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 operable from the inside without a key.	14
*9.5.b Is not operable, broken, or otherwise unsafe, faucet cannot turn on, or no hot and cold water.	13
*9.5.c Under sink plumbing assemblies including any piping, faucet risers, traps, or sink connectors are leaking.	12
*1.4.c Exterior stairs have broken, loose, decayed, or missing pieces, or are otherwise unsafe.	12
1.5.a Weather stripping is missing or allowing air to enter.	11
*1.4.b Exterior decks or other platforms have broken, loose, decayed, missing pieces, or are otherwise unsafe.	11
*2.2.b Walls, floors, or ceilings are soft, spongy, or wet to the touch.	11
*8.5.a. Dripping faucets, or slow drain.	10
*8.6.b Is not operable, broken, or otherwise unsafe, faucet cannot turn on, or no hot and cold water.	10
*2.1.c Bathroom and laundry room fan or passive vent, if used in place of openable windows, is not operable, pulling air, or vented to the exterior. .	9
*2.3.c Interior stairs have loose, broken, decayed, missing pieces, or are otherwise unsafe.	9
*5.1.a Required permanently-installed heating equipment/device is defective or missing.	8
*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.	7
*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.	7
*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.	7
*1.6.b Exterior wall is failing: leaning, crumbling, missing pieces, broken, or deflected.	7
*1.4.a Exterior Stairs: Structural members are leaning, decayed, detached or are otherwise unsafe	6
9.4.a Cooking appliance: One or more parts are inoperable or missing but appliance still has food cooking capability.	6
*2.1.b Kitchen fan, if used in place of openable windows, is not operable or pulling air.	6
*8.1 Bathroom does not include a fully functional sink, toilet, and tub or shower.	6
*7.1 Running water temperature is below 100 degrees Fahrenheit.	6
*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
*9.3.b Is inoperable or not in good working condition.	5
*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.	5
*1.1.b Roof is not weather-proof or has clear evidence of leaking.	4
*1.6.a Exterior walls allow water or weather penetration (e.g., seeping water, leaking air, coming in through a crack or hole)	4
*5.3.b Any gas, wood, or fuel-burning heat source lacks proper ventilation or is not properly isolated from a sleeping area.	4
*3.1.c Security bars, grills or similar devices on emergency escape windows are not openable or have inoperable release mechanisms.	4
*8.5.c. Under sink plumbing pipes or connectors are leaking.	4
*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 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.	3
*9.5.a Dripping faucets, or slow drain.	3
*9.4.b Cooking appliance not rated for indoor use or entire appliance is inoperable.	2

*2.1.d Clothes Dryer ducts are plastic, detached, leaking, damaged, not vented to the exterior or otherwise restricting airflow.	2
1.5.b Sills or frames have decayed wood or separated joints.	2
*1.1.a Roof has holes and/or structural member is broken or decayed.	2
*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.	2
5.3 Fuel-burning appliances, where allowed, must be of an approved type, properly installed, and maintained in good working order.	2
*8.6.a Dripping faucets, or slow drain.	2
*6.4 Any bathroom, laundry room, utility room, common hallway, stairway, or porch does not have an operable light fixture.	2
*2.2.d Floors and any support system is not maintained in a safe and sound condition	2
5.1 Heat source in the unit is permanent, working, and in good repair.	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
*1.3.b Foundation is failing: leaning, crumbling, missing pieces, broken, or deflected.	1
*8.3 Tight-fitting door missing if bathroom is in a food preparation area.	1
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.	1
9.2 Counter is missing tile, pieces are broken, is made of a porous material, or is pulling away from the wall.	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.	1
*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.	1
*1.4.d Guardrails, including approved intermediate rails or other guards, on the open sides of any landing, deck, or platform that are 30 inches or more above grade or other surfaces are missing, loose, broken or are otherwise unsafe.	1
*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>	1
*8.6.c Plumbing pipes or connectors are leaking.	1
*3.4.b Stairway enclosure doors do not self-close and latch.	1