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CONSULTING, TRAINING AND INSPECTION SERVICES

REAC Compilation Bulletin

August 26, 2002

On August 14, 2002 REAC posted a compilation bulletin which was designed to clear up past misunderstandings by REAC inspectors and to replace the PI-OPS bulletins. The following statement appears on the HUD-REAC web site:

“The Pi-Op Bulletins have been renamed to REAC PASS Bulletin. The REAC Compilation Bulletin document consolidates and replaces all previously issued Pi-Op bulletins (#1 through #19), all FAQ’s and all other PASS-related notices/guidances published in the past. This revised document is aimed to provide one consolidated source for REAC PASS-related information for guidance.”

This bulletin was published again on August 26, 2002 which has been listed as its “effective date”

THIS BULLETIN MAKES CHANGES TO EXISTING AND CURRENT FEDERAL REGISTER NOTICES AS WELL AS PAST ACCEPTED PROCEDURE, READ THIS BULLETIN AND COMMENTARY CAREFULLY.

I have also added commentary and questions, several of which REAC responded to on September 26th, 2002.

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A negative sign demonstrates that this definition or policy demonstrates a negative change to a previously issued policy or standard by REAC



A positive sign demonstrates that this definition or policy demonstrates a positive change to a previously issued policy or standard by REAC

NEUTRAL

A neutral sign demonstrates that this definition or policy demonstrates a neither a negative or positive change.

Question: The compilation bulletin is an unsigned document that in several areas makes changes to the protocol that has been issued in official Federal Register notices. Is it correct to assume that this document supersedes officially published Federal Register notices that were previously issued by HUD?

REAC Response: REAC inspector is solely required to be familiar and compliance with UPCS standards and requirements. Inspector should not be concerned with issues related to Federal Register notices.

Follow Up Observation: REAC in this response demonstrates an arrogant behavior in assuming that Independent Contracted Inspectors can not be concerned with the way the program is administered. Unfortunately Housing Agencies utilize Federal Register Notices to receive guidance on how to administer and follow along with a complicated inspection process.



DEFINITIONS

All-Inclusive List

A list of all the occupied and vacant units in each building of the property: Only the altered units, commonly known as permanent off-line units, (see General information – Unit Types) will not be included. An inspector may utilize a rent roll, site map or self-prepared list as long as it includes all occupied and vacant units/buildings.

NEUTRAL

Building

An individual building is any structure that has a contiguous roofline, a permanent foundation, is enclosed on all sides and at least one utility is servicing it such as electric, gas, water, or sewer. For the purpose of clarification, a contiguous roof does not necessarily have the same roofline elevation. A structure that has a contiguous foundation but does not have a contiguous roof should be considered as two buildings.

Question: There is a significant change in the definition of a building. As published in your 2.3 Training Guide page 1-38 which states that “A building is defined as any structure that has a permanent foundation, is enclosed on at least three sides, and at least one utility is servicing it, such as, electric, gas, water or sewer” According to your new definition of a building it now must be enclosed on “ALL” sides.....Is it correct to now assume that 3 walled maintenance garages are no longer to be inspected under UPCS because they do not fit the definition of a building?

REAC Response: A maintenance garage enclosed on three sides does not meet the definition of a building and should be inspected in accordance with the guidance provided in the REAC Compilation Bulletin dated August 26, 2002.

Follow Up Observation: REAC’s response leads you to believe that 3 walled building should be inspected when in fact any structure that does not meet the definition of a building should not be inspected by a REAC inspector although they may need to verify that it does not meet the definition.



Building Type

The UPCS software lists the following building types

- Common Building: A detached non-residential structure
- Duplex: A detached residential structure consisting of two units
- Low-Rise/Garden Apartment: A multi-unit residential structure consisting of two and one-half floors or less with common hall entrance
- Mid/High-Rise Apartment: A multi-unit residential structure consisting of three or more floors **with or without elevators**
- Row/Town Houses: A single unit residential structure that is connected to a similar structure by a common sidewall with individual exterior unit entrance
- Single Family: A detached residential structure consisting of one unit

NEUTRAL

Child-Safety Window Guard

Window guards that normally found in apartment and public hallway windows to protect children (10) ten years or younger from falling to exterior of building.

Commercial or Leased Space

Commercial or leased space must be inspected and deficiencies observed recorded in Common Areas, Other Community Spaces.

HUD-insured Property

Any property that has an active HUD-insured mortgage, the inspector is required to conduct 100% inspection of the property, which include all site, buildings, and units.

NEUTRAL

IA

Inspector Administration: A group within REAC QA responsible for the management of all HUD /REAC certified inspectors including issues related to performance.

Multifamily Housing

Office of Housing/Multifamily: These properties may be identified by their distinctive property ID which is always 9 integers in length beginning with an "8" (e.g. 800001234).

PIH

Office of Public and Indian Housing: These properties may be identified by their distinctive property ID that is always 5 or fewer integers in length. The REAC is currently a support organization for HUD under PIH.

Professional Common Sense

A common sense approach that requires inspectors to exercise sound, practical, and prudent judgment based on their physical inspection training and experience. Professional common sense should be applied in conjunction with REAC guidance.

Comment: REAC's definition of professional common sense requires that an inspector exercise judgement based upon a 5 day training as well as "experience" but you will notice in several REAC responses to questions below regarding 504 and Access that it appears to be the opposite. Inspectors come from a wide variety of backgrounds and experience which leads to fluctuations in interpretations:

i.e. Under UNIT Defenitions for Hot Water Heater
the defect Rust/Corrosion (Hot Water Heater)

Deficiency: The equipment or associated piping/ducting shows evidence of flaking, oxidation, discoloration, pitting, or crevices.

Level 1: You see superficial surface rust.

Level 2: You see significant formations of metal oxides, flaking, or discoloration--or a pit or crevice.

The two levels of defined defects leave much to be open to the inspectors interpretation through his or her personal experience. Words like "significant" are "grey" area words that ultimately must be determined by inspector "opinion". What is at stake is whether or not you are rated for this defect depends upon the inspector you receive.

Servicing Mortgagee

A mortgage company approved by HUD to service HUD assisted or insured mortgages. They are required to inspect their HUD portfolio properties using the UPCS and HUD/REAC certified inspectors.

Scattered Site – Single Family

A scattered-site property comprised of only "single family buildings" (see definition below). The property may consist of multiple "single-family buildings" built at different times, spread (scattered) over the city, or county. If any one building contains more than four HUD assisted or insured units, the property is not considered as a Single Family Scattered Site and must be visually verified prior to generating the inspection sample.

Single Family Building

For purposes of determining a single family scattered site only, a single family building is a building comprised of one to four HUD assisted or insured dwelling units. For example, a row townhouse building, which contains one to four HUD assisted or insured units, is a single family building. Do not confuse "single family building" with the UPCS software building type definition for "Single Family".

Technical Assistance Center (TAC #)

An identification number provided by the REAC Help Desk (TAC 877-406-9220), as necessary, to Contractors or Servicing Mortgagee inspectors. When required by the UPCS software, inspector will need to secure a TAC # in order to successfully upload an inspection.

NEUTRAL

504 Units

Refers to Section 504 of the Rehabilitation Act of 1973: These are units specifically designed for physically impaired residents.

Question: How does an inspector address issues of reasonable accommodation where the unit is not specifically designed as 504? For example if an elderly/disabled resident who utilizes a walker and resides in a “standard” unit asks for an accommodation to have interior doors removed, Should the REAC Inspector record these missing doors as defects even though there is a stated accommodation made by the property?

REAC Response: As repeatedly stated in REAC PASS training and in various REAC directives issued previously, REAC inspection is not a code inspection. Accordingly, inspector is not required to be familiar with the reasonable accommodation requirements under UFAS. Inspector is only required to understand the definition for “504 Units” and apply the definition in accordance with UPCS standards and requirements.

Follow up Comment: In my opinion REAC did not answer the question. Simply put... under 504 Units where a physical accommodation has been made (i.e. bedroom doors removed in a standard design unit) should be considered a 504 Unit for the purposes of a REAC inspection. That was the answer we were seeking. REAC again deferred to their training class which has changed over the course of the past few years, many inspectors have not been in a REAC training class since May 2000.

GENERAL INFORMATION

Buildings

- Free-standing or Attached Structures. Inspectors must adhere to the following guidance when determining whether and how to inspect freestanding or attached structures:
 - a. If a storage shed, garage or carport is attached to the exterior of a building and designated for the specific use of a unit, inspect it and record deficiencies in the associated building and unit as applicable.
 - b. If a storage shed, garage, or carport is attached to the exterior of a building and used as common space, record deficiencies in the associated building and common area as applicable.
 - c. If a storage shed or garage is a free-standing building and designated for the use of a specific unit, inspect it and record deficiencies in the associated building and unit as applicable.
 - d. If a storage shed or garage is a free-standing common building, inspect it as an individual common building and record deficiencies as applicable (see case “c” above for exception).
 - e. If a storage shed, garage, or carport is a free-standing structure that does not meet the building definition, regardless of whether it's associated with the unit, do not inspect it.

NEUTRAL

- Group Home. The building type for a group home located in a converted single-family house is Single Family.
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Building Type

- There are two types of buildings that are commonly observed during an inspection:
 - Permanent Off-Line Building: These are buildings that P/O/A has taken off-line permanently and no longer include in the rent roll reporting (e.g. building scheduled for demolition). These buildings are normally boarded-up and isolated by fencing/wires. Do not delete and record these buildings as “uninspectable” prior to generating sample.
 - Temporary Off-Line Building: These are buildings that the P/O/A has taken off-line temporarily for rehab activities. These buildings are typically 100% vacant and may be boarded-up for security purposes. Include these buildings in the profile prior to generating the sample. If selected as a sample building, record the building as “uninspectable” after visual verification and select the next alternate building in the listing. If the inspector cannot meet the building sample requirements, the contract inspector should call his/her help desk and service mortgagee inspector should call REAC TAC for guidance.

NEUTRAL

Cancellation

- Inspector: If an inspector must cancel an inspection due to an unexpected emergency, severe weather advisory, or sickness, it is the inspector’s responsibility to notify Help Desk/ POA immediately, and secure a REAC TAC # for the subject cancellation. Contract inspector should call his/her help desk and service mortgagee inspector should call REAC TAC directly.
- POA: If a POA does not show up or cancels a scheduled inspection, the contract inspector should call his/her help desk and service mortgagee inspector should call REAC TAC directly, and secure a REAC TAC # for the subject cancellation.
- Inspectors must reschedule any inspection in which residents have not been notified, unless receiving permission to proceed with the inspection from REAC. The contract inspector must contact his/her help desk and service mortgagee inspector must contact REAC TAC immediately for guidance.

NEUTRAL

Certificates

- Boilers: A boiler certificate may be issued by a city or state government agency, insurance company or any other entity, which has jurisdiction and/or authority to issue such a certification.
- Lead Base Paint Disclosure Form and Inspection Report: Inspectors are required to request the LBP disclosure form and inspection report from the POA for all properties, regardless of the type of resident population, for buildings constructed prior to 1978. A comment must be provided in the Property Information Comments field regarding resident population for elderly only. For the purpose of determining whether the LBP disclosure form and inspection report is applicable, the inspector must use the building construction year not the date of “gut rehab” or other renovations.

NEUTRAL

Conducting Inspections

- All inspectors are required to conduct a REAC inspection by following the same protocol and guidance, and adhering to the same code of conduct, this includes inspection of all five (5) inspectable areas.
- Inspectors are required to complete inspections without the assistance of property personnel. Although no specialized equipment other than a DCD is required to conduct a REAC inspection, inspectors should arrive on site prepared to test all smoke detectors, be able to accurately determine door and hallway widths (FHEO surveys), and inspect all applicable areas, including those in which there may be no lighting.
- While conducting an inspection, an inspector should not open closed doors within a unit. The resident, if present, or property personnel, is responsible to provide access.
- Property personnel throughout the inspection must accompany an inspector. If a property's personnel does not show up for the inspection, or does not accompany the inspector throughout the entire inspection, the contract inspector must contact his/her help desk and service mortgagee inspector must contact REAC TAC directly and report the inspection as unsuccessful.
- An inspector should inspect no more than the total number of sample units required by the UPCS software. If an inspector cannot meet the sample size after utilizing all sample units and alternates, the contract inspector must immediately contact his/her help desk and service mortgagee inspector must contact REAC TAC for guidance.
- Prior to or during the course of the inspection, an inspector must not share sample building or unit numbers with property personnel before the actual inspection of the building or unit. An exception to this policy may be made for properties, which are not master keyed. In such cases, property personnel may be provided with a list of sample units for the purposes of pulling keys, only.

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Question: Could you please clarify the reasoning for this change in policy. Prior to this It was understood that it was "acceptable" to give the list to the P/O/A when beginning the inspection tour. This in my view presents an appearance of starting the inspection from a standpoint of "miss-trust" towards the property and the field inspector by REAC.

REAC Response: This is not a change in policy. UPCS standards and requirements have always called for inspector not to share sample buildings and units with property personnel prior to or during the course of the inspection. This reminder was included in the REAC Compilation Bulletin to ensure straight compliance with this requirement

Follow up Comment: REAC is absolutely incorrect in stating that there was never a change in policy, many inspectors will attest to that. Until recently REAC never stated this policy either in writing or in training, The REAC training manual 2.3 does not mention a procedure one way or another. .

NEUTRAL

- To maintain statistical validity, it is important to select the sample units and alternates in the order in which they are displayed in the “sample units” field. The order of **selection** within the UPCS software is critical. Once the units are properly selected, the order of inspection may be any order the inspector chooses to facilitate the inspection.
- Inspectors may not carry a firearm onto a property.

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- Collaborative Quality Assurance (CQA) reviews are used to evaluate an inspector’s proper interpretation and execution of the inspection protocol. If a protocol question arises in which the inspector disagrees with the CQA inspector, or the inspector has other concerns, the contract inspector may contact his/her help desk and service mortgagee inspector may contact REAC TAC at any time throughout the inspection for guidance.

Comment: It is a known fact as many inspectors and property representatives will attest that these so called “collaborative” QA reviews usually turn out to be a battle of personalities where the HUD QA in many cases makes field interpretations that tend to focus negatively on the property. It is a statement of fact from the Congressional Budget Office who did a study of this process that inspections conducted with a HUD QA tend to be lower scoring than those without.

Duplication of Deficiencies

- Inspectors should never record a single identified deficiency in multiple locations. For example, if a pothole in a parking lot is recorded in Potholes/Loose Material, the inspector should not also record the deficiency in Settlement/Heaving or in Cracks. Inspectors should determine the most appropriate location to record the deficiency. However, if an inspectable area deficiency also causes an H&S deficiency, both must be recorded.

Comment: This is a positive because in the past, REAC required inspectors to record a single defect in multiple areas.

For example: Pi-Ops Bulletin 19 referred to the visual observation of mold which would be recorded on walls or ceilings as appropriate, but it also required inspectors to record this as a health and safety issue under air quality.

Fire Extinguisher

- The local Fire Department, Fire Marshall, and any other entity that has received authorization from local Fire Department to conduct fire extinguisher inspection may inspect fire extinguishers annually. If the P/O/A cannot provide evidence of the authorization for self-inspection, record as deficiency.

Comment: This is a local code issue and REAC demonstrates its irony in comment when in several responses to me REAC is quoted as saying “REAC inspection is not a code inspection” so how can they refer to the local fire department in a federal inspection and then require the agency to provide proof that extinguishers are not required to be inspected.

Observed Deficiencies

- Inspectors are required to call out all observed deficiencies and their level of severity to property personnel during the inspection. If property personnel become argumentative regarding deficiencies during the course of the inspection, an inspector may complete the inspection without calling out the remainder of the deficiencies.

Question: Does REAC interpret that a property representative who “questions” or “challenges” a level of severity or attempts to discuss and be “educated” as to a defect definition and/or asks to be shown the definition or protocol guidance within the inspector’s DCD as being “argumentative”? Should the inspector be allowed or required to answer questions that asked in a normal manor regarding the UPCS protocol?

REAC Response: Professional common sense should be applied in interpretation of P/O/A behavior. In general, inspector is only required to call out deficiencies and its level. Any further discussion is not considered a part of the UPCS standards and requirements.

Follow up Comment: REAC again demonstrates its total lack of public relations skills, stating that the REAC inspector does not have to answer any questions or discuss the process with the property representative. Agencies would be well advised to consider this matter when dealing with a particularly rude or offensive REAC inspector. It is a know fact that REAC inspectors do make mistakes but apparently the properties do not have the right to address issues or question (in a professional and polite manner) the inspector.

Occupancy Percentage

- The occupancy percentage must be recorded by all inspectors for Multifamily Housing properties. Occupancy percentage may be calculated by dividing the total number of occupied units by the total number of all units and then multiplying the result by 100.
- Enter this information in the Comments field of the Property Information Tab as an integer with the “%” sign and with no spaces between them (e.g., 87%). Any Multifamily Housing property inspection that is uploaded without the occupancy percentage will be rejected.

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Office Equipment

- Inspectors may not utilize HUD field office or POA office telephone or fax equipment for downloading, uploading, calling or faxing documents.

Property Profile Verification

- The inspection protocol requires an inspector to visually verify (see definition section) building count and type, and to confirm participant, certificate, area measures and other building/unit information with the POA, prior to generating the inspection sample. Adding and editing of the information, if necessary, is done at that time. However, inspection data discovered to be in error during the course of the inspection may be edited as necessary with the exception of the building and/or unit count. The contract inspector must contact his/her help desk and service mortgagee inspector must contact REAC TAC and secure a REAC TAC #, before making any changes to the building and/or unit count after sample

generation with the exception of the addition of a common building found on a "Single Family Scattered Site". (See Visual Verification below).

Question: does this only apply to single family scattered sites or does this also include duplexes, triplexes, etc., scattered through out the city or multiple cities. For example we inspected a property that consisted of four 20 unit buildings spread across 200 miles between the first and last building

REAC Response: For purposes of determining a single family scattered site only, a single family building is a building comprised of one to four HUD assisted or insured dwelling units. (The example you have mentioned above, four 20-unit buildings, visual verification of all buildings is required prior to generation of sample.)

Follow up Comment: REAC demonstrates its inability to read and apply its own definitions on page 3 of this document REAC defines a single family home as:

- Single Family: A detached residential structure consisting of one unit

But look at the reality of this question, according to the REAC procedure the inspector MUST drive 200 miles with the property representative in order to "verify" the buildings PRIOR to the inspection starting.

Participants

- Participants are property contacts and must be identified by name, role, organization (where applicable), street and e-mail address, and phone and fax number. At least three participants must be provided. For PIH properties, one of the participants must be "Owner/PHA". For Multifamily properties, two of the participants must be "Owner" and "Management Agent".

Scheduling

- Contractors: Inspections are to be performed during normal business hours, which vary from agency to agency. Inspections may begin at any time the POA and inspector agree upon, the morning inspections usually begins no later than 9AM and an afternoon inspection may begin as late as 3:00pm for a small property, but usually begins by 1PM. The contract inspector must notify his/her help desk and service mortgagee inspector must notify REAC TAC, and secure a REAC TAC #, of any inspection start **time** that differs from the start time specified in Scheduler prior to the day of the inspection. If an inspector has scheduled two inspections for one day and finishes the morning inspection early, the inspector must not start the second inspection before the start time specified in Scheduler.
- If an inspection cannot be completed in one day, it must be completed during the next business day before inspector can start a second inspection.
- If the inspection cannot be completed on contiguous business days, the contract inspector must call their Help Desk who will request a new inspection number from REAC. The service mortgagee inspector must contact REAC TAC directly and request for a new inspection number. The inspector will have to reschedule the new inspection to a later date.

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- If an inspection is going to be continued for more than one day, the EH&S form shall be completed and provided to the POA at the end of first day and at the end of each successive day until the inspection is completed.

Severe Weather Policy

- Inspectors should not inspect a property if a “severe weather advisory” is in effect. A severe weather advisory includes, but is not limited to, hurricanes, tornadoes, thunderstorms, hail or any other adverse weather condition that would likely endanger the safety of the participants. This also includes a snowstorm in which a severe weather advisory has been issued.

Snow Policy

- In the absence of a severe weather advisory, inspectors should attempt to inspect all properties, regardless of the presence of snow. Any inspectable items not visible due to snow are then recorded as No Observed Deficiency (NOD). In the Comments field for the property (for site comments), or for each building and unit, provide a comment indicating which items were hidden by snow.

Comment: Since this document now replaces ALL Pi-Ops bulletins previously issued it is important to not that under Pi-Ops bulletin 17 which was issued on November 28, 2000 the following statement appears with respect to severe weather and snow

“A public housing agency or property representative may choose to cancel an inspection due to weather.”

This statement is noticeably absent from this document.

Units

- Non-Revenue Units (also known as site manager or staff units): These are units that typically do not produce revenue for the property and are usually occupied by property staff. They may not be shown on the rent roll by the POA but must be included in the building’s unit count and on the all-inclusive list prior to generating the sample. If selected as a sample unit, they must be inspected as per the protocol.
- Nursing and Group Homes Units (also known as client rooms): For nursing homes, group homes, and other assisted living facilities, any room with a bed, or beds, is considered a “client room.” Inspectors must change the number of units in the DCD to reflect client rooms, and generate a sample based on the number of client rooms rather than the number of beds. Because client rooms do not always have assigned numbers, the inspector should identify each client room by a unique number, after consultation with the POA. The inspector should start at the lowest level and move to the right, and then up through the property to select rooms as they are listed in the sample. Sample client rooms, regardless of the number of beds, are to be recorded as one bedroom dwelling units. For mixed-use facilities that contain both client rooms and residential (apartment-type) dwelling units – the total number of units used to generate the sample will include both.
- Section 8 Units: Some Multifamily Housing (see definition) properties do not have a HUD insured mortgage but continue to have HUD assisted

NEUTRAL

Section 8 units (project-based). The POA will typically provide the inspector with this information. Only the Section 8 units for each building will be counted when establishing the building/unit profile and for sample selection. However, all other inspectable areas of the property must be inspected as per the protocol.

Unit Types

- There are three types of units that are commonly observed within a building:
 - Occupied Units: Units presently occupied that must be included in building's unit count.
 - Vacant Units: Also known as temporary off-line units. Units currently vacant that are or will be available for rent. They may include fire damaged units and units undergoing rehabilitation and must be included in the building's unit count.
 - Altered Units: Also known as permanently off-line units. Units that have been converted from a dwelling unit use to a non-dwelling unit use (e.g. office/community spaces, police service spaces, etc.). These units should be removed from the building's unit count, prior to generating sample, and the altered spaces should be considered as building "common space". If a building contains an altered unit(s) converted to common space and the building has been selected in the sample, the space must be inspected as common space. If this building is not selected as a sample building, the space does not have to be inspected. Inspector is required to confirm with the POA, the existence of any altered units prior to generating sample. If error was made, inspector should record "uninspectable" for this unit, the contract inspector must contact his/her help desk and service mortgagee inspector contact REAC TAC for guidance before proceeding with the inspection.
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UPCS Software

- As a result of a software update on 9/21/01, sample buildings may now be generated which, contain no sample units. For these sample buildings, only Building Exterior/Common Areas/Building Systems will be inspected

Comment: This represents a significant change in the sampling policy. Prior to this the only buildings that were sampled were common buildings and apartment buildings with unit(s) to be inspected within. This means that buildings will show up to be sampled without any units inside being sampled. This could affect a properties score dramatically because the building will be inspected for Building Exterior, Building Systems and Common Areas.

Uploading Inspection Data

- Inspectors must upload inspection data to REAC within 24 hours from the time of inspection completion. If the inspection cannot be uploaded for technical reasons, the contract inspector must contact his/her help desk and service mortgagee inspector must contact REAC TAC, and secure a TAC # from REAC.
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- Successfully uploaded inspections may be deleted from the DCD one week after the inspection and after they have been accepted by REAC. It is recommended that inspector save the file in their computer desktop.

Vacant Unit Policy

- **Multifamily Housing:** For all Multifamily Housing properties, vacant units that are included in the random sample will be inspected only at properties with 15 percent or more vacancy rate.
- **PIH Housing:** Do not inspect vacant units at public housing properties. However, vacant sample units must be visually verified.
- If no sample units are available in the sample building, inspector should select an alternate unit of a similar building type. If there are no alternate units available for the similar building type, then select an alternate unit from the next building type group. If there are no alternate units available for selection, the contract inspector must call his/her Help Desk and service mortgagee inspector must call REAC TAC, and secure a REAC TAC # before proceeding.

NEUTRAL

Visual Verification

- The protocol requires the inspector to walk or drive **around** the property site to visually verify the existence of all buildings with property personnel, prior to sample generation.
- In the case of "single family scattered sites" (see definition) visual verification with property personnel is not required prior to sample generation. For these properties, the inspector may establish the building/unit profile utilizing data provided by the POA, generate the sample, and start the inspection. Building/unit profile information must be visually verified as the inspection progresses. The inspector is still responsible for visiting all sites to verify all buildings and units, including those not in the sample. If a common building (no units) is discovered that was not included in the building/unit profile: add the building; change the Reason Uninspectable field to "None Entered"; provide an explanation in the building Comments field; and inspect. If an occupied building is discovered that was not included in the building/unit profile, the contract inspector must notify his/her Help Desk and service mortgagee inspector must notify REAC TAC.
- Only properties that are to be inspected on the same day, by the same inspector, may be visually verified at the same time.

Question: does this only apply to single family scattered sites or does this also include duplexes, triplexes, etc., scattered through out the city or multiple cities. For example we inspected a property that consisted of four 20 unit buildings spread across 200 miles between the first and last building

REAC Response: For purposes of determining a single family scattered site only, a single family building is a building comprised of one to four HUD assisted or insured dwelling units. (The example you have mentioned above, four 20-unit buildings, visual verification of all buildings is required prior to generation of sample.)

Follow up Comment: REAC demonstrates its inability to read and apply its own definitions on page 3 of this document REAC defines a single family home as:

- **Single Family:** A detached residential structure consisting of one unit But look at the reality of this question, according to the REAC procedure the inspector **MUST** drive 200 miles with the property representative in order to "verify" the buildings **PRIOR** to the inspection starting.

- If buildings or units are occupied but rehab work is in progress, the inspector must inspect the buildings or units, recording any deficiency as per the UPCS software.

PROPERTY INSPECTABLE AREAS

SITE

Site General Information

- Inspectable items such as Grounds, Market Appeal, and Walkway/Steps recorded as NA without justifiable comment in the Property Comments field will be challenged by PI-Ops after an inspection is uploaded, even when no land owned by the property exists around a building (e.g. inner city property).
- The inspector is required to input in the UPCS software the total square footage for parking lots/driveways/roads and walkways/steps. For PIH properties, the inspector should request the square footage information from the POA. For Multifamily Housing properties, the inspector may request the square footage information from the POA.
- For scattered site properties, all individual sites must be inspected whether or not a building on the individual site is in the sample. To determine a deficiency for inspectable items, which use proportionality, evaluate the defect area as a percentage of the total applicable area of all individual sites. All other deficiencies found on any site must be recorded in Site as per the protocol.
- All roadways and walkways **within** a property site's perimeter must be inspected. Deficiencies observed must be recorded as applicable regardless of evidence offered by the POA of public authority (city, county, state, etc.) ownership.
- All roadways and walkways **abutting** a property site's perimeter that the POA represents as owned and maintained by a public authority need not be inspected.
- Proportionality deficiencies must continue to be recorded in the pop-up "defective area" screen after the 5% threshold is reached.

NEUTRAL

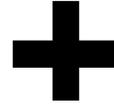
Fencing and Gates

- Exterior fences, also known as perimeter fences, are generally found along the perimeter of the property. Interior fences are found within the property's perimeter. A security fence could be either an exterior or interior fence but its intended purpose is to provide safety and security for the property residents.
- If a property utilizes fencing along its perimeter as an exterior security fence whether owned by the property or not, the fencing must be evaluated for deficiencies.
- Privacy fence that is used for privacy of an individual unit, should be considered as an interior fence.

Comment: This represents a significant removal of the REAC policy of professional common sense with regard to evaluating a fence that is obviously not part or owned by the property just because it borders the property.

Grounds

- The deficiency Overgrown/Penetrating Vegetation is intended to address conditions that have an adverse effect on the physical condition of the property or negatively impact the use of the property by residents. Do not record a deficiency for vegetation intentionally grown on walls or fences that is maintained and not adversely affecting the structure or its intended use. Adverse effect can be considered either as visible damage or no visible damage.



Play Areas and Equipment

- Inspectors should inspect park benches located within a play area and record deficiencies as Damaged/Broken Equipment as applicable. Benches not located within a play area are not inspected.



Comment: Prior to this bulletin, benches were not evaluated as part of the inspection.

Walkway/Steps

- An inspector should record damage to a concrete slab porch or entry stoop in Walkways/Steps as applicable.

NEUTRAL

BUILDING EXTERIOR

Doors

- As a result of a software update on 9/21/01, sample buildings may now be generated which contain no sample units. Therefore, door deficiencies may have to be recorded in different inspectable areas depending on whether or not the sample building has sample units to be inspected. Record as follows:
 - If a sample building has sample units, record any deficiencies observed on the unit entry doors within the associated units. Do not record deficiencies for unit entry doors on units not in the sample.
 - If a sample building has no sample units to inspect, record any deficiencies observed on any unit entry doors on the building exterior in Building Exterior, Doors and any deficiencies observed on any unit entry doors in a common area hall or corridor in Common Areas, Halls/Corridors/Stairs, Doors. Disregard the Note in the Building Exterior, Doors deficiency that says, "This does not include unit doors".
- There are two types of entry doors: (1) A building entry door is a door that leads from the exterior of a building into the building interior. (2) A unit entry door is a door that leads from the exterior of a building or from a building common area into a unit. The entry door for a single-family home is considered a unit entry door and record building exterior –entry door as

NEUTRAL

N/A. Interior doors within a building that lead from one common area into another are not considered entry doors.

- The deficiency Deteriorated/Missing Caulking Seals applies only to entry doors. Entry doors not originally designed with seals are not required by the UPCS software to have seals. Inspectors must use their own professional experience and observation to determine whether or not a factory applied seal is or was present. Inspectors should not record a deficiency for missing or deteriorated after-market seals whether applied by the property staff or residents.
- When the inspector observes light around a closed entry door with a seal that exhibits no evidence of seal damage, record the deficiency as door hardware or door damage for observed light around the door.

FHEO - 32" Wide Main Entrance

- This inspectable item applies to all occupied building types.

Question: What is the definition of a "main entrance" in buildings of a design and type where the ONLY exterior doors lead directly to a UNIT? Does an inspector just pick a single unit door as a main entrance? (this has been stated to be the action by HUD QA persons)

REAC Response: Professional common sense should be applied. For the purpose of answering FHEO questions, building such as a single family house, unit entrance door is considered main entrance of this dwelling building.

Follow up Comment: Agencies should be aware that this is not a scoreable item (REAC does not deduct points) this question was designed to gather information for the OFHEO. Unfortunately it appears that gathering inaccurate information is what is being done.

FHEO - Obstructed or Missing Accessibility Route to Main Floor Entrance

- This inspectable item applies to all occupied building types. Each main floor entrance, as defined in FHEO - 32" Wide Main Entrance above, must have an accessible route to and from it. Accessible routes include a level surface to the door, ramps where necessary, and sufficient (36") width.

Question: According to UFAS guidelines section 4.3.8, changes in levels along an "accessible route" allow up to 1/2 inch and would still meet the definition of "Level" How does REAC define "level surface"? It would seem a wise course of action that if this is only for collection of information for HUD's Office of FH that inspectors collect data in an accurate manner.

REAC Response: Again, REAC inspector is not conducting a code inspection and is not required to be familiar with UFAS standards. Inspector should apply professional common sense in the interpretation of "level surface".

Follow up Comment: Since there is a definitive definition of a Level surface it would seem that professional common sense would not be needed.

Fire Escapes

- All buildings must have acceptable fire exits. Therefore, inspectors must never record Fire Escapes as NA.

NEUTRAL

Foundations

- The deficiency Cracks/Gaps is applicable to both foundation walls and floors (structure slabs).
-

Lighting

- An inspector must inspect all broken lighting fixtures or bulbs on the building's exterior and record deficiencies in Broken Fixtures/Bulbs as applicable. Site lighting not attached to a building must be assigned to nearest building and evaluated as a part of that building's exterior lighting. An exception to this rule is a deficiency for exterior lighting that is controlled (switched) from within individual units. These deficiencies must be recorded in Unit/Lighting of the associated unit.

Comment: In this new definition, wall mounted lights that are located near the entrance door and switched on from inside the unit are now evaluated under UNIT defects. Prior to this they were evaluated as part of building exterior.

This appear rather odd change in policy when you take into account REAC's temporary scoring in which Building Exterior defects are not scored but Unit defects are..

Roofs

- All roofs that have a permanent means of access must be inspected. A stairway leading to a roof, a ladder permanently affixed to a wall, or any other apparatus that does not require the use of a portable ladder is considered a permanent means of access. An inspector is not required to access the roof when a permanent means of access is not available.
- The levels of the deficiency, Missing/Damaged Shingles, apply to both missing and damaged shingles.

NEUTRAL

Storages

- Not all structures have basements, but may have storage areas, as designated by P/O/A. Inspectors are required to inspect all areas accordingly.

Walls

- Holes in a building wall that serve an intended use should not be recorded as a deficiency. However, holes that have been abandoned or are no longer serving their intended use must be recorded as a deficiency in Missing Pieces/Holes/Spalling as applicable.
-

Windows

- As a result of a software update on 9/21/01, sample buildings may now be generated which contain no sample units. Therefore, the deficiencies, Broken/Missing/Cracked Panes, Missing/Deteriorated Caulking/Glazing Compound, and Security Bars Prevent Egress may have to be recorded

in different inspectable areas depending on whether or not the sample building has sample units to be inspected. Record as follows:

- If a sample building has sample units and common areas, record any sample unit deficiencies observed in the window inspectable defects above within their associated units and common areas deficiencies observed in the common areas inspectable defects within their common area location with one exception. Window screen-related deficiencies observed in sample units and common areas should be recorded in Building Exterior, presently there is no place in unit or common areas window to record window screen-related deficiencies.
- If a sample building has no sample units to inspect, record all window deficiencies observed whether in common areas or any unit in Building Exterior, Windows.

Comment: This represents a significant change in the sampling policy. Prior to this the only buildings that were sampled were common buildings and apartment buildings with unit(s) to be inspected within. This means that buildings will show up to be sampled without any units inside being sampled. This could affect a properties score dramatically because the building will be inspected for Building Exterior, Building Systems and Common Areas.

- Insulated glass units (thermopane) that show evidence of seal leakage such as condensation or discoloration **between** the glass panes must be recorded as a Missing/Deteriorated Caulking/Glazing Compound, Level 3 deficiency.

Question: Is it correct now to assume according to the change made above that if there is “evidence” of seal leakage and NO evidence of damage to the window or surrounding structure that Inspectors are still to record the deficiency as Level 3?

REAC Response: As stated earlier, REAC inspector is solely required to be familiar and compliance with UPCS standards and requirements. Inspector should not be concerned with issues related to Federal Register notices. In this instance, evidence of seal leakage as depicted in the Compilation Bulletin must be recorded as a Level 3 deficiency

Follow Up Comment: This reflects a direct change to the CFR issued 26NOV01 and 28JUN00 and to the current PASS software (2.3) where the REAC now makes a level 2 defect a level 3 defect. Currently in those CFR's and the PASS 2.3 Software the following definition applies:

Under UNIT Windows Missing/Deteriorated Caulking/Seals

L1: N/A

L2: Most of the window shows missing or deteriorated caulk, **but there is no evidence of damage** to the window or surrounding structure.

L3: There are missing or deteriorated caulk or seals--**with evidence of leaks or damage to the window** or surrounding structure..

-
- When fixed security bars are present, that cover a window that is the only second means of emergency egress from a floor area (e.g. room, unit, building) on the third or lower floor, the deficiency Security Bars Prevent Egress must be recorded. However, a deficiency must not be recorded for windows that are not large enough or not otherwise designed for egress.
 - A hasp attached to moveable security bars is not a deficiency provided that the inspector can test the bars to evaluate proper operation. However, a lock on moveable security bars, requiring a key (special tool) to open, whether locked or unlocked at the time of inspection, must be recorded as a Security Bars Prevent Egress deficiency, when the window is the only second means of emergency egress from a floor area on the third or lower floor.
 - **Child-Safety window guards** should not be considered as “Blocked Egress”.



Comment: Security bars that are hinged and have padlocks on them on buildings such as community rooms are now considered to be a defect by REAC as Level 3 and a life-threatening health and safety issue, whether or not they are unlocked when the building is occupied. This demonstrates a lack of professional common sense when taking into account the issue of security.

BUILDING SYSTEMS

Building Systems General Information

- As a result of a software update on 9/21/01, sample buildings may now be generated which contain no sample units. In the case where a Building System inspectable item(s) (e.g. HVAC, Fire Protection, etc.) is located inside a unit and is not visible to the inspector, the protocol requires the inspector to record NOD for the item and make a comment in the Building Comments field identifying which item could not be inspected because it was located in a unit that was not in the sample.



Comment: This represents a significant change in the sampling policy. Prior to this the only buildings that were sampled were common buildings and apartment buildings with unit(s) to be inspected within. This means that buildings will show up to be sampled without any units inside being sampled. This could affect a properties score dramatically because the building will be inspected for Building Exterior, Building Systems and Common Areas.

Domestic Water

- The extension or drip leg on a pressure relief valve located on a hot water heating system must be no more than 18” from the floor.



Electrical System

- The inspector should record electrical deficiencies for electrical equipment that services more than one specific area of the building (e.g. main electrical panel) within Building Systems. Electrical deficiencies for electrical equipment that services a specific area of the building (e.g. community room, hallway, unit) should be recorded in their respective locations.

NEUTRAL

-
- All exterior electrical boxes (see below for exception regarding timer and disconnect) below the meter base belong to the property. Exterior Panel boxes contain electrical devices such as fuses or circuit breakers and must be inspected for electrical deficiencies (e.g. missing cover, missing breaker, evidence of corrosion). If the exterior panel box was designed with an internal cover and it is missing, record the deficiency as Missing Cover. If it was not designed to have an internal cover, do not record a deficiency. However, inspector must record any H&S issue such as exposed wires observed on any electrical box that is not locked. Locked exterior panel boxes are not a deficiency, if property personnel can quickly provide access. Otherwise, these should be recorded as Blocked Access to Electrical Panel. If the first exterior panel box inspected showed no internal cover in the original design, inspector can avoid opening the remaining secured panel boxes that are of the same design.

Comment: This is assuming that all inspectors have a sufficient level of electrical knowledge about the different types of electrical boxes and know which ones were or were not designed with internal covers. Rust on an exterior electrical box should be considered normal wear and tear not a defect of in good repair.

-
- **All other electrical boxes (interior or exterior) such as timers and disconnects must be inspected provided** that doing so will not interrupt electrical service **or require the use of tools such as keys for locks, screwdrivers, cutters, etc.** For the purpose of clarification, plastic ties are not considered secured locked.
 - All interior panel boxes must be inspected. **Locked interior panel boxes are not a deficiency, if property personnel can quickly provide access.** Otherwise, these should be recorded as Blocked Access to Electrical Panel.

Question: Which is it, if there is a lock on an electrical box and they do not readily have a key, does an inspector record a defect or not? REAC confuses the issue by two statements in conflict (in bold) confused by your two statements above... In the first you state that interior or exterior boxes should not be inspected if they require keys for locks and in the second you state that interior boxes must be inspected if the property personnel can quickly provide access otherwise record as blocked...

REAC Response: As stated on page 15 of the Compilation Bulletin, locked pane boxes are not a deficiency if property personnel can quickly provide access. Otherwise, these should be recorded as Blocked Access to Electrical Panel

-
- A missing elevator motor room control panel cover must be recorded as a Missing Cover deficiency if the control panel was designed to have a cover. If a cover was not part of the design, do not record a deficiency.

Comment: Many agencies have stated that removing the doors was a recommendation of the servicing company because of the heat that the switching gear generated.



-
- Inoperable GFI outlets located on the building exterior are not a deficiency in the UPCS software but may be recorded as a Building Exterior/H&S/Hazards/Other when observed.

NEUTRAL

Comment: Agencies should be aware that the Health and Safety Defect – Hazards – Other is currently not a scored item and no points are removed.

-
- Do not inspect Non-P/O/A owned utility boxes. Non-P/O/A utility boxes are any boxes ahead of the meter base.

Comment: Professional Common Sense is once again not utilized, there are scenarios where there is utility equipment not owned by the agency that is located after the electric meter.



Emergency Power

- The inspectable defect Run-Up Records/Documentation Not Available is applicable to emergency generators only.

NEUTRAL

Fire Protection

- Buildings must meet the requirements of local and state fire and safety codes. As a result, some buildings have fire extinguishers, while others do not. If fire extinguishers are not present and there is no evidence that they are supposed to be present (e.g. mounting brackets, fire cabinets, etc.), it is not a deficiency.
- All fire extinguishers observed must be inspected, resident owned and property owned.
- Applicability of the definition for Missing/Damaged/Expired Extinguishers:
 - Level 1: Applies to an individual building with only fire extinguishers and no other fire control system. Record a deficiency if 5% or **less** of the extinguishers are missing, damaged, or expired.
 - Level 2: Applies to an individual building regardless of the number of fire control systems. Record a deficiency if more than 5% but no more than 10% of the extinguishers are missing, damaged, or expired.
 - Level 3: Applies to an individual building regardless of the number of fire control systems. Record a deficiency if more than 10% of the extinguishers are missing, damaged, or expired.

Or

- Level 3: Applies to an individual building regardless of the number of fire control systems where extinguishers are installed in common areas on each floor, typically low rise/garden apartments and mid/high rise apartment buildings. Record a deficiency if there is not an operable/non-expired fire extinguisher on each floor. For clarification purpose, the statement applies only if there is evidence that the floor used to have one.
- A missing/damaged/expired fire extinguisher in a sample unit(s) should be recorded as a deficiency based on the sample unit's proportional representation of the total number of sample units inspected within an individual building. For example, in a row/townhouse building with 3 sample units, if 2 of the sample units have expired extinguishers, 66% of the extinguishers are deficient, a Level 3 deficiency.
- Inspector should track the number of Fire Extinguishers located in each building to determine the level of deficiency. The total number of fire extinguishers for a building shall include, but is not limited to sample unit fire extinguishers and common area fire extinguishers.
- When inspecting fire hoses, use the inspectable defect, Missing/Damaged Expired Extinguishers to record deficiencies by substituting fire hoses for fire extinguishers within the levels of the deficiency. The UPCS software does not require fire hoses to have inspection tags. Do not record a deficiency for fire hoses with expired or missing tags.

Comment: This is a local code issue and REAC demonstrates that by its very first sentence. Especially when you consider the REAC statement "REAC inspection is not a code inspection" so how can they refer to the requirement of local fire departments or code departments in a federal inspection and then state that fire hoses do not require inspection tags when in fact many state and local codes do require them.

HVAC

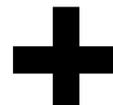
- HVAC in Building Systems is only NA when all HVAC systems within a building are located only within the units and are not being used to service common areas.

NEUTRAL

COMMON AREAS

Common Areas General Information

- Medical-related equipment found in nursing and group homes is not included in the UPCS software and must not be inspected.
- It is not a UPCS requirement for P/O/A to provide smoke detectors in common areas. However, if it is there, it must function.
- For additional guidance on inspectable items applicable to both common areas and units, see the Unit section.



Basement/Garage/Carport

- Record common area garage and carport deficiencies in this inspectable item only when these areas are attached to or within the confines of the building. For freestanding garages, see General Information, Buildings.

NEUTRAL

FHEO - 36" Wide Interior Hallways

- This inspectable item only applies to an occupied multi-story building with an elevator. All interior hallways to units and building common areas must be at least 36" wide. For buildings with no elevator, record as NA.

FHEO - Accessible Outside Common Areas

- This inspectable item applies to all occupied buildings, regardless of building type, that have areas **outside** of the building that are commonly used by all residents. Outside common areas include parking lots, freestanding or attached common buildings (e.g. laundry building), patios, play areas, etc.



Comment: Agencies should be aware that this is not a scoreable item (REAC does not deduct points) this question was designed to gather information for the OFHEO. Unfortunately it appears that gathering inaccurate information is what is being done.

Lighting

- In common areas where light bulbs are inoperable, light bulbs are not to be considered in the cumulative percentage if the fixture is proven operable. The deficiency specifically deals with whether the fixture is broken. Bulbs are not addressed in the definition.

Comment: So how does a fixture get "proven" to be operable, REAC suggests that the property agent carry bulbs with them during the inspection. A property agents statement that it is the bulb may or may not be sufficient.



Pools and Related Structures

- Swimming pools must be operational during the summer season. During the remainder of the year, do not record a deficiency for a pool that is not operational, record as NOD.

NEUTRAL

Trash Collection Areas

- Inspectors must record any trash collection system component (e.g. chute, chute door, lock, counterweight, and compactor) that has failed as a Chute Damaged/Missing Components, Level 3 deficiency.

NEUTRAL

Windows

- All window deficiencies observed in common areas must be recorded in their common area respective locations. See also Building Exterior, Windows, for additional guidance.
- Insulated glass units (thermopane) that show evidence of seal leakage such as condensation or discoloration **between** the glass panes must be recorded as Missing/Deteriorated Caulking/Glazing Compound, Level 3.
- **Child-Safety window guards** should not be considered as “Blocked Egress”.

Question: Is it correct now to assume according to the change made above that if there is “evidence” of seal leakage and NO evidence of damage to the window or surrounding structure that Inspectors are still to record the deficiency as Level 3?

REAC Response: As stated earlier, REAC inspector is solely required to be familiar and compliance with UPCS standards and requirements. Inspector should not be concerned with issues related to Federal Register notices. In this instance, evidence of seal leakage as depicted in the Compilation Bulletin must be recorded as a Level 3 deficiency

Follow Up Comment: This reflects a direct change to the CFR issued 26NOV01 and 28JUN00 and to the current PASS software (2.3) where the REAC now makes a level 2 defect a level 3 defect. Currently in those CFR’s and the PASS 2.3 Software the following definition applies:

Under UNIT Windows Missing/Deteriorated Caulking/Seals

L1: N/A

L2: Most of the window shows missing or deteriorated caulk, **but there is no evidence of damage** to the window or surrounding structure.

L3: There are missing or deteriorated caulk or seals--**with evidence of leaks or damage to the window** or surrounding structure..

UNIT

Unit General Information

- Refrigerators, stoves, and window air conditioners owned by the resident must be inspected and deficiencies recorded as if the appliances were owned by the property.

Comment: How does a fixture get “proven” to be operable, REAC suggests that the property agent carry bulbs with them during the inspection. A property agents statement that it is the bulb may or may not be sufficient.

-
- The POA must provide access to all building common space and sample units within each building. In addition, within each sample unit, all rooms and closets must be accessible or the inspector must select an alternate unit. Inspectors are not required to move furniture to gain access to an inspectable area. If property personnel or the resident will not move the furniture or open a closed door to provide access, the inspector must select an alternate unit.
 - For client rooms, record a kitchen or bathroom in a sample unit when it may be accessed only through the unit. If a kitchen or bathroom is accessed through a common area, deficiencies must be recorded appropriately in Common Area. If no kitchen or bathroom may be accessed through the unit, record NA for kitchen and/or bathroom as applicable.

NEUTRAL

-
- If a utility has been disconnected in a sample unit, record the unit as uninspectable, reason "Other Hazard", and select an alternate unit. In the Unit Comments field indicate which utility was disconnected. For Multifamily Housing properties, inspector will need to inspect units with disconnected utility if vacancy rate percentage exceeds 15% for the property.

Comment: REAC applies a double standard here requiring that in Public Housing units with deactivated utilities (gas/electric) to NOT be inspected but in the Private Multi-Family sector if the vacancy rate exceeds 15% then units with deactivated utilities MUST be inspected..

Bathroom

- All showers and tubs must be inspected by operating the hot and cold water faucets or control.
- Do not record a Ventilation/Exhaust System – Inoperable deficiency for bathrooms constructed without either an exhaust fan or a window.
- If a roof exhaust fan, which vents bathrooms in a high rise, has failed, record a Systems, Exhaust System, Roof Exhaust Fan Inoperable, Level 3 deficiency for the roof exhaust fan but do not record a deficiency for each unit bathroom that the roof exhaust fan serves.

NEUTRAL

Call-For-Aid

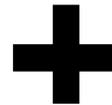
- If a call-for-aid system is designed to have a pull string from the call switch, the string must be present and fully extended or an Inoperable, Level 3 deficiency must be recorded.

Comment: How much control over a residents use of a property is acceptable, many Call alarm strings are tied up by residents for their own convenience and may or may not hamper them in an emergency.

Ceiling

- Hole, paint, and water stains/water damage/mold/mildew defects are cumulative when they appear on any one ceiling surface (per room).
- Smoke, grease or dirt on ceiling surfaces that can be washed off is not considered “deteriorated” paint.

Comment: This reflects a positive change where in the past inspectors may have applied unprofessional common sense when determining between in need of housekeeping or in need of painting



- The levels of the deficiency, Ceiling – Holes/Missing Tiles/Panels/Cracks, apply to both missing and damaged ceiling tiles and panels.

Doors

- If a majority of doors within a unit are painted or varnished, then any unpainted or unvarnished door must be recorded as a Damaged Surface – Holes/Paint/Rusting/Glass, Level 3 deficiency. If a majority are unpainted or unvarnished, do not record a deficiency.

Comment: The question.....to what purpose does this serve? Comes to mind regarding this defect.

For example lets take a unit that has 3 bedroom doors, 3 closet doors, and 1 pantry door. (total 7)

A single unpainted door is a **level 3 defect**.
Four (4) unpainted doors is NOT.
All doors unpainted is NOT.



- Do not record unit entrance door deficiency for units that are not in sample.
- Locks are not required on doors, but if a lock was installed, it must be inspected to ensure that it functions as designed, with three exceptions: (1) Common area interior doors (not unit entry) may have missing locks; (2) 504 units may have missing locks; and (3) Public Housing bedroom doors may have missing or damaged locks. Inspectors must distinguish between locks, which are intended to prevent others from entering a room, and hardware that allows a door to latch (e.g. knob set or passageway set). Door hardware that is designed to latch and hold the door in place is not a lock and must function as designed.



Question: Why are damaged bedroom door locks allowed in Public Housing but NOT in Multifamily Housing?

REAC Response: Both REAC and inspector are required to comply with bedroom door locks inspection requirements mandated by HUD's Office of Multifamily and Office of Public Housing.

Follow Up Comment: This would appear to be an un-equal application to housing depending upon their source of funding.

-
- Double-sided keyed knob locks and deadbolts, whether locked or unlocked, when observed on doors that serve as one of the two required means of egress from a floor area, are a H&S, Emergency /Fire Exits, Blocked/Unusable deficiency. This applies only to the doors on the third or lower floors.

Comment: Again, REAC takes issue with local codes and what is allowed, many properties contain double keyed doors and they are allowed by local codes. REAC now defines what is unacceptable use of door hardware types.

-
- A stick is an acceptable lock only for a sliding glass door. If the stick is not installed it must be in the vicinity of the door and must be installed by the inspector to ensure that the door can be secured.
 - Holes left in doors from the removal of hardware must be evaluated as door surface damage.

NEUTRAL

-
- **Significant** peeling/cracking/no paint, rust which affects the integrity of the door surface, or broken/missing glass are applicable only to Level 3 of the Damaged Surface deficiency. Holes ranging in size from ¼” to 1” on other than a bathroom or entry door are the only Level 2 deficiency.

Comment: OK, so what does REAC mean by the word “significant”. Websters Dictionary defines the word to mean a “noticeably or measurably large amount”. Here is another one of those issues where inspector professional common sense will be applied (in a variety of ways.)

-
- Screen, storm and security doors are defined as follows:
 - A screen door has a screen with or without a locking device.
 - A storm door may have a glass panel but is designed to provide protection to the entry door.
 - A security door is designed to provide added security through strength and has additional locks and/or other locking mechanisms.
 - The deficiency Damaged/Missing Screen/Storm/Security Door, Level 1 applies to missing as well as damaged screen and storm doors.
 - A door missing from its jamb or frame is recorded as a Missing Door regardless of whether or not it is in the immediate area.
 - Double doors that serve one door entrance are considered to be one door. Record as one missing door if one or both are missing.

NEUTRAL

- Doors removed by property personnel in units, other than elderly or handicapped units, must have all evidence of their previous existence removed. The holes where the hinges were located as well as the mortised area of the hinges and the strike must be filled, sanded, and painted; otherwise record as a Missing Door deficiency.
- While conducting an inspection, an inspector should not open closed doors within a unit without the permission of the resident, if present, or property personnel.
- Group Homes are special use facilities (not unlike nursing homes), the rule applicable to 504 units should be applied. If management chooses not to allow the clients to have locks on said doors then we do not require them. Inspectors should exercise “professional common sense”.

NEUTRAL

Electrical System

- GFI-Inoperable is an automatic non-life threatening health and safety deficiency when recorded. Disregard the comment in the definition which says, “If this condition is a health and safety concern, you must record it as Health and Safety: Electrical Hazards”.
- GFI circuit breakers in electrical panel boxes must be tested by pushing the test button to trip the breaker and resetting.

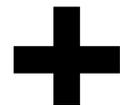
NEUTRAL

Floors

- Stains on floor covering are only applicable to Level 1 of the Floor Covering Damage deficiency, not to Levels 2 or 3.

Comment: Prior to this clarification the definition was left wide open to professional common sense.

- When determining floor damage severity, the total percentage is based on total area of similar material floor covering.

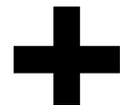


Hot Water Heater

- The extension or drip leg on a pressure relief valve located on a hot water heating system must be no more than 18” from the floor.

Comment: Prior to this clarification the definition was left wide open to professional common sense.

- Hot Water Heater is never recorded as NA whether or not the tank is actually located within the unit. Record deficiencies for the hot water system in either Unit/Hot Water Heater or Systems/Domestic Water whichever is most appropriate



HVAC System

- When a cover is missing on a convection or radiant heat system, a Convection/Radiant Heat System Covers Missing/Damaged, Level 3 deficiency must be recorded. In addition, if sharp edges and/or a burn hazard are present, the inspector must record those hazards manually in H&S, Hazards, Sharp Edges and/or Other (for the burn hazard) as applicable.

NEUTRAL

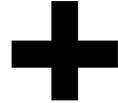
Kitchen

- Cabinet deficiencies are based on defects observed on individual components as a percentage of the same components' total for the entire cabinet system. For example, if 2 drawers and 2 doors (4 components) are damaged in a cabinet system comprised of 8 drawers and 20 doors (28 components), 14% of the cabinets have damage, a Level 2 deficiency.

NEUTRAL

- Delaminating should be recorded as cabinet damage when applicable but surface chipping or finish deterioration is not a recordable defect.

Comment: Prior to this clarification the definition was left wide open to professional common sense.



- Damage to laminated countertops is only recordable as a deficiency when it occurs below the laminate and 20% or more of the countertop is affected.

NEUTRAL

- An exhaust fan in a kitchen that has been intentionally blocked is a Range Hood/Exhaust Fans – Excessive Grease/Inoperable, Level 3 deficiency unless there is an operable window in the kitchen.

Comment: Why is it that a bathroom exhaust fan can be blocked but is not a defect if the motor still functions, but a kitchen exhaust fan is a Level 3 defect.



- On a gas stove, if a burner(s) is not functioning, the property personnel must be given an opportunity to check the pilot light(s) and re-light it if it is out. If all burners are operable after re-lighting the pilot, record a Range/Stove –Missing/Damaged/Inoperable, Level 1 deficiency. If a burner(s) still does not function, record a Level 2 or Level 3 deficiency as applicable. If the POA does not wish to check or light the pilot, record a Level 2 or Level 3 deficiency as applicable.



Comment: Once again, how much control over a residents use of a property is acceptable, Pilot lights out and dirty burners that prevent and even flame distribution can be attributed to resident housekeeping.

Laundry Area

- Leaking faucets on laundry tubs are not a recordable defect in the UPCS software.
- If an interior dryer vent filter box is properly attached to an **electric** dryer, do not record a deficiency. These devices are not intended for use on gas dryers.

NEUTRAL

Lighting

- All rooms must be inspected for a switched light source. This may be a wall or ceiling fixture or a lamp. A wall switch or electrical outlet is not a switched light source. The inspector must switch on the fixture or lamp. If it does not operate, property personnel may replace the light bulb. If it still does not function, the inspector must record as a Missing/Inoperable Fixture as applicable.

Question: What would the inspector record if there is a switched wall outlet (normally for the installation of a resident owned lamp) and there is no lamp in the room?

REAC Response: If inspector cannot inspect a room in a unit for a switched light source, the inspector must record as a Missing/Inoperable Fixture as applicable.

Follow Up Comment: If you read REAC's response correctly you will determine that ALL rooms that do not have a switch that controls a permanent light fixture but controls an outlet had better have a lamp otherwise it is a level 3 defect.

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- Fixture or lamp globes or bowls are not considered part of the lighting system. Do not record them as a deficiency as long as the light functions without them.

Comment: Prior to this clarification the definition was left wide open to professional common sense.

Outlets/Switches

- The deficiency Missing (Outlets/Switches) pertains to both missing and damaged outlets and switches.

Patio/Porch/Balcony

- Damage to a concrete slab porch or entry stoop must be recorded in Site, Walkways/Steps as applicable.
- Record damage to balusters and side rails in Patio/Porch/Balcony. All other deficiencies observed on unit patios, porches and balconies must be recorded in the associated unit.

Smoke Detector

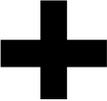
- Smoke detectors within a unit must be operable and located on each living level. Living level is defined as areas where residents spend the majority of their time.

Question: Is a basement where there may be a laundry or family type room, or workshop be considered a "living level". It would be obvious that they do not spend a majority of their time there.

REAC Response: A basement, finished or unfinished, where residents are using either for recreation purpose or doing laundry and/or utility-related services, meets the definition of a "living level".

Follow Up Comment: Local codes come into play again here with different requirements....remember as of the date of this document, smoke detector deficiencies do not deduct any points from a REAC score.

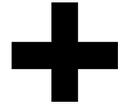




NEUTRAL

Walls

- An inspector must evaluate Damaged/Deteriorated Trim on any one wall as a percentage of the total trim on that one wall surface. Missing trim, previously applied, must also be included.
- Smoke, grease or dirt on wall surfaces that can be washed off is not considered “deteriorated” paint.



Comment: This reflects a positive change where in the past inspectors may have applied unprofessional common sense when determining between in need of housekeeping or in need of painting

Windows

- All window deficiencies observed in sample units must be recorded in their respective units. Do not inspect windows in units not in the sample; see also Building Exterior, Windows, for additional guidance.
- **All windows in sample units must be inspected (tested).**

NEUTRAL

Comment: This means and inspector must open and close EVERY window in a unit.

- Window screen-related deficiencies observed in sample units should be recorded in “Building Exterior”. Presently, there’s no place in unit’s window to record window screen-related deficiencies.
- A stick is an acceptable lock for a window if it is observed in place or in the vicinity of the window. The inspector must test the window with the stick installed to ensure that the window can be secured.
- Applicability of the deficiency Inoperable/Not Lockable. For ease of comprehension, the deficiency is broken into two parts: Inoperable addresses the operation of a window (i.e. cannot be opened or closed due to damage to the frame, faulty hardware, etc.); and Not Lockable addresses only the lock.
 - Inoperable: All windows must operate as designed. Record an Inoperable/Not Lockable, Level 1 deficiency for all windows which do not operate as designed except for the following two situations. (1) Windows which are damaged and cannot be opened that provide the only second means of egress from a floor area (e.g. room, unit, or building) on the third floor or below must be recorded as an Inoperable/Not Lockable, Level 3 deficiency with an H&S, Emergency/Fire Exits, Blocked/Unusable deficiency. (2) Windows which are damaged and cannot be opened on the fourth floor and above, where there are no other operable windows in the same floor area, must be recorded as an Inoperable/Not Lockable, Level 3 deficiency.
 - Not Lockable: All windows which are accessible from the outside (e.g. ground level or by means of an exterior stairway) must be lockable. Record an Inoperable/Not Lockable, Level 3 deficiency if they cannot be

locked. In addition, all other windows, which are designed to lock, must lock or an Inoperable/Not Lockable, Level 3 deficiency must be recorded. Windows, except those accessible from the outside, that are not designed to lock are not a deficiency.

- Insulated glass units (thermopane) that show evidence of seal leakage such as condensation or discoloration **between** the glass panes must be recorded as Missing/Deteriorated Caulking/Glazing Compound, Level 3.

Question: Is it correct now to assume according to the change made above that if there is “evidence” of seal leakage and NO evidence of damage to the window or surrounding structure that Inspectors are still to record the deficiency as Level 3?

REAC Response: As stated earlier, REAC inspector is solely required to be familiar and compliance with UPCS standards and requirements. Inspector should not be concerned with issues related to Federal Register notices. In this instance, evidence of seal leakage as depicted in the Compilation Bulletin must be recorded as a Level 3 deficiency

Follow Up Comment: This reflects a direct change to the CFR issued 26NOV01 and 28JUN00 and to the current PASS software (2.3) where the REAC now makes a level 2 defect a level 3 defect. Currently in those CFR's and the PASS 2.3 Software the following definition applies:

Under UNIT Windows Missing/Deteriorated Caulking/Seals

L1: N/A

L2: Most of the window shows missing or deteriorated caulk, **but there is no evidence of damage** to the window or surrounding structure.

L3: There are missing or deteriorated caulk or seals--**with evidence of leaks or damage to the window** or surrounding structure..

- When fixed security bars are present, that cover a window that is the only second means of emergency egress from a floor area (e.g. room, unit, building) on the third or lower floor, the deficiency Security Bars Prevent Egress must be recorded. However, a deficiency must not be recorded for windows that are not large enough or not otherwise designed for egress.
- A hasp attached to moveable security bars is not a deficiency provided that the inspector can test the bars to evaluate proper operation. However, a lock on moveable security bars, requiring a key (special tool) to open, whether locked or unlocked at the time of inspection, must be recorded as a Security Bars Prevent Egress deficiency, when the window is the only second means of emergency egress from a floor area on the third or lower floor.
- **Child-Safety window guards** should not be considered as “Blocked Egress”.

NEUTRAL

HEALTH AND SAFETY

- When noting the location of a Health and Safety defect, inspector should take caution not to record in the wrong location for that defect.

Emergency/Fire Exits

- The Blocked/Unusable (Emergency/Fire Exits) deficiency is only applicable to blocked or unusable emergency/fire exits on the third or lower floors. All floor areas (e.g. room, unit or building) on these floors must have a minimum of two independent unobstructed exits. The deficiency applies as follows:
 - If the only window in a floor area (e.g., room, unit, or building) is blocked by a window air conditioner, furniture, or any other obstruction, including an inoperable window sash and the area has only one exit door, the inspector must record a Blocked/Unusable deficiency.
 - If a floor area has an obstructed window or door, but has at least one other unobstructed window and an exit door, there is no blocked egress. The inspector should not record a deficiency.
- The note in the Blocked/Unusable definition that states, "This does not apply to individual units" must be disregarded.
- There are four (4) areas to record Blocked/Unusable (Emergency/Fire Exits): (1) H&S - Building Exterior; (2) H&S – Systems; (3) H&S - Common Areas; and (4) H&S – Units. Record where observed.
- All Blockage which limits a person's ability to exit a room in case of emergency, is considered a deficiency. Professional common sense and inspector knowledge are to be applied.

Comment: This is another area where professional common sense can affect the score in a negative or positive way.

- In the comment field for the deficiency, the inspector should explicitly state why the obstruction prevents egress. If a resident could easily climb over or otherwise traverse the furniture or obstruction, there is no deficiency. Keep in mind the property's resident population (i.e. family, elderly, handicapped, etc.), when making a determination of this defect.

Flammable Materials

- Lubricating oil stored in an elevator motor room is an Improperly Stored deficiency.
- Gasoline fueled power equipment with gasoline in the tank stored in a building's basement is an Improperly Stored deficiency.
- Lawnmower/gasoline that are properly stored in garage should not be recorded as a health and safety deficiency.

Comment: Once again, how much control over a residents use of a property is acceptable, and local codes differ over what is an acceptable limit of flammable storage allowed in residential units.