



BERNARD J. MOROSCO

CONSULTING ~ INSPECTION & TRAINING SERVICES

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QUALITY ASSURANCE - Clarifications

From: **Reac_Inspector_Admin [ReacInspectorAdmin@hud.gov]**
Sent: **Friday, September 10, 2010 3:51 PM**
Subject: **Quality Assurance - Clarification of Frequently Asked Questions**

(Our interpretations and how they affect you are in bold RED Italics)

Attention All REAC UPCS Certified Inspectors:

In an effort to clarify a number of frequently asked questions posed to REAC Quality Assurance Inspectors and staff, the HUD REAC QA Division has produced a list of clarifications for 6 issues that often surface during the course of a physical inspection. These clarifications pertain to both Multi-Family and Public Housing physical inspections conducted by both contract and HUD QA inspectors.

Issue #1: Lighting

When inspecting a unit for lighting, only ONE fixture needs to be operable for each room inspected. Per the deficiency definition, "...a permanent lighting fixture is missing or not functioning, and NO other switched light source is functioning in the room." In other words, if there is no other switched light source, there is a deficiency. However, if there is another switched light source, there is no deficiency. If one fixture (per room) is operable, then the requirement for lighting is satisfied.

Our Interpretation on how this affects you: Negatively (LEVEL 3 non H/S) here we go again, REAC is now AGAIN insisting that if there is NO permanent fixed fixture that there must be an "un-fixed fixture" or lamp otherwise your property will be hit for an inoperable light source in that unit

Issue #2: Health & Safety

Health & Safety deficiencies observed in NON-SAMPLE buildings are to be recorded under Site, Health and Safety, Hazards, Other.

Our Interpretation on how this affects you: Neutral ("Other Hazard" defects do NOT deduct points) For example if you have a VACANT Building (Vacant Buildings are not inspected) or if you have a building that did NOT come up in the Inspection Sample....i.e a building that is not properly boarded up and it has a broken window the site gets hit for sharp edges.

Issue #3: Egress

When determining egress for two adjoining rooms that are connected without obstruction, this should be considered ONE area. An example of two adjoining rooms that are connected without obstruction could be a living room connected to a kitchen without a wall separating the two areas.

Our Interpretation on how this affects you: Positive (Blocked Emergency Exits)

Some Inspectors have in the past considered a blocked living room window (one window in the living room) as a Blocked Emergency Exit when there is a main exit (front entry) and a secondary means through the kitchen to either a window or a rear door) This will prevent an unnecessary hit for Blocked Emergency Exit (a Life Threatening Health and Safety violation)

Issue #4: Window Deficiencies

When inspecting sample buildings with sample units and common areas, all window deficiencies observed in units and common areas are recorded in the inspectable area in which they are observed. This ensures, in accordance with UPCS protocol, that deficiencies in non-sample units are NOT recorded. Similarly, it ensures that window deficiencies that are observed are only recorded once. Health & Safety window deficiencies that are NOT observed in a sample unit should be recorded under Exterior, Health and Safety, Hazards, Other.

Our Interpretation on how this affects you: Positive (Windows) Some Inspectors currently record for example a Unit that is "selected for inspection" that has a broken window in both the unit AND the Building Exterior (REAC has had a challenge with this one trying to prevent a "double" hit for the same defect) Issues with Health and Safety Issues for windows on Building Exteriors (Broken windows where there are sharp edges or Security Bars that prevent egress)

Issue #5: Call-for-aid

If a call-for-aid cord is located adjacent to a bed, and is easily accessible to someone lying on the bed, yet the cord is not accessible to someone lying on the ground, this should NOT be recorded as a deficiency. The key to determining if an observed deficiency exists is assessing whether or not the call-for-aid functions as intended. Regardless of where it is placed, a call-for-aid will not be accessible from every angle, position, or distance. If a call-for-aid is completely blocked and therefore not accessible, it does not function as intended and that is a deficiency. Similarly, if a call-for-aid is not operable when tested, it does not function as intended and that is also a deficiency. Professional common sense is necessary when determining if a call-for-aid is accessible.

Our Interpretation on how this affects you: Neutral to Positive (Call for Aids) Some Inspectors have interpreted this as the string must be so many inches from the floor etc. This answers only one issue, what it does not answer is if the string is intentionally tied up by the resident and it does not address the bathroom call for aid. Good luck with this one.

Issue #6: Electrical Hazard

When assessing an electrical enclosure (i.e. the gap between breakers and the internal cover of an electrical panel), any opening (gap) that measures more than $\frac{1}{4}$ of an inch between the breakers and the internal cover of an electrical panel should be recorded as an electrical hazard. This deficiency is to be recorded under the applicable inspectable area (i.e., building systems, building exterior, site, common areas or unit), Health & Safety, electrical hazards, exposed wires/open panels. Openings that measure $\frac{1}{4}$ of an inch or less are NOT to be recorded as electrical hazards.

Our Interpretation on how this affects you: Negatively (Missing Breakers Life Threatening Health and Safety Issue) Now you have to carry a ruler with you so and opening that is 3/8ths is now a hit, This does provide some clarification for the hard line REAC inspectors who were hitting on ANY size gap in a breaker panel. REAC has not mandated that inspectors "actually" carry rulers but some of them do.

For questions or more information, please visit us on the web at:

<http://www.hud.gov/offices/reac/products/pass/qa.cfm>.

• 56 Woodberry Road, New Hartford, NY 13413 •
PHONE (315) 794-0825 • FAX (425) 962-5854
bernie1603@aol.com

www.morosco.org

