

Effective Date: October 2, 2017

# REAC Compilation Bulletin



**RAPID 4.0 VERSION 3**



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# INTRODUCTION

**This Bulletin applies to all physical inspections conducted using the HUD UPCS protocol and includes and supersedes all previous editions and updates.**

It incorporates all previous guidance that HUD has given on several matters pertaining to physical inspections. It provides answers to some of the most common questions received from inspectors in the field and *clarifies certain areas of the inspection protocol to further ensure that physical inspections are objective and conducted in accordance with the protocol.*

*The information in this Bulletin has been previously communicated through email, training sessions, and other methods. It has been compiled here for ease of reference.*

It is the inspector's responsibility to apply this guidance when conducting UPCS inspections. Failure to apply and follow these guidelines will negatively impact your performance and evaluation as an inspector.

If you have any questions about the material included in this Bulletin, please contact the Real Estate Assessment Center (REAC) Technical Assistance Center (TAC) at 888-245-4860 or send email to: [https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/public\\_indian\\_housing/reac/support/tac](https://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/reac/support/tac)

Updates to this Bulletin, as well as other information of which you need to be aware, can be found at: [https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/public\\_indian\\_housing/reac/products/pass/pa ss\\_bulletin](https://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/reac/products/pass/pa ss_bulletin)

Information on REAC's Quality Assurance (QA) program and frequently asked questions (FAQs) about the UPCS protocol can be found at:

[https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/public\\_indian\\_housing/reac/products/pass/qa](https://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/reac/products/pass/qa)

INSPECTOR ADMINISTRATION:

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UPCS TRAINING:

[https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/public\\_indian\\_housing/reac/products/pass/in sp-cert](https://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/reac/products/pass/in sp-cert)

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[https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/public\\_indian\\_housing/reac/products/pass/p ass\\_guideandrule](https://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/reac/products/pass/p ass_guideandrule)

# BUILDINGS, UNITS, AND GENERAL INFORMATION

## DEFINITIONS

- A. ALL-INCLUSIVE LIST.** A list of all the occupied, vacant, and non-revenue units (including the number of bedrooms per unit) in each building of the property. Only the altered units, commonly known, as permanent off-line units will not be included. To determine the units that will be inspected and to record property occupancy, an inspector must use a rent roll, site map or self-prepared list that includes all occupied and vacant units/buildings.
- B. COMMERCIAL OR LEASED SPACE.** Commercial leased space is defined as an area of a building or separate building that is being rented to a specific third party business or organization and is not being used as a residential unit.
- 1. On all properties, with exception to Project-based Section 8 Multifamily Housing properties with no active loan.** Commercial or leased space must be inspected and the deficiencies observed recorded in the appropriate Common Areas. Components and other equipment represented as being owned by the lessee need not be inspected for proper operation (e.g., ovens, freezers, shelves, etc.). All Health and Safety deficiencies on items owned by the lessee must be recorded under [Common Area], [Health and Safety], [appropriate floor level], [Hazards], [Any Other - This Does Pose a Risk of Bodily Injury]. If the property provides documentation from the local HUD Field Office that identifies specific leased commercial space as being exempt from the inspection, it will not be inspected. In the comments field on the Development (PHA)/Property (MFH) screen the inspector must reference the HUD documentation and include the effective date range for the exemption and the name of the HUD staff authorizing the exemption.
  - 2. Project-based Section 8 Multifamily Housing properties with no active loan.** Commercial leased space will not be inspected. All other non-residential spaces in a sample building must be inspected. Do not include a building in the profile if it only contains commercial leased spaces and there are no other areas of the building that the Section 8 residents would utilize.
- C. HUD-INSURED PROPERTY.** Any property that has an active HUD-insured mortgage. The inspector is required to inspect the sample units based on the total number of units and to inspect the Site, Building Exteriors, Systems, and Common Areas.
- D. INDUSTRY STANDARD REPAIR NOTICE.** This notice provides clarification concerning inspection procedures to be followed by all Uniform Physical Condition Standard (UPCS) inspectors who conduct physical inspections of HUD assisted and insured properties. The inspection procedures are applicable to all properties that are subject to UPCS physical inspections.
- 1. Standard.** All repairs to address UPCS deficiencies in preparation for a REAC inspection shall be made in a good and workmanlike manner with materials that are suitable for the purpose and free from defects. The phrase “good and workmanlike manner” means: a. Ensuring that the component, as repaired, performs its intended function/purpose; and b. Finishing the repair in a manner reasonably compatible with design and quality of the original and adjoining decorative materials.
  - 2. Clarifying Guidance.** Each repair is made in accordance with the industry standard for the inspectable item (e.g., a hole in the drywall is repaired using the same or equivalent materials, materials have the same texture, minimal deviation from and/or have an indistinguishable difference from the original esthetics/appearance.) A deficiency will be recorded for each sub-

standard repair made to avoid or disguise an observed deficiency based on the size of the area affected and/or the item inspected.

- This notice is not intended for our UPCS inspectors to use as a means to record inspectable items as being deficient due their own preference or bias.
- It should not be used to address code issues.
- The inspector will enter “NIS”, meaning Not Industry Standard, in the comments field for each deficiency that the inspector records due to the substandard repair and will provide a detailed comment for each explaining the circumstances for the NIS recording. This will allow REAC to track where and how many times these types of issues occur.
- For additional guidance refer Inspector Notice No. 2016-03 at [https://portal.hud.gov/hudportal/documents/huddoc?id=ia\\_notice2016-03.pdf](https://portal.hud.gov/hudportal/documents/huddoc?id=ia_notice2016-03.pdf)

**INSPECTOR NOTE:** Often, when properties are making or have made repairs to walls, floors, ceilings, etc., the new materials will not be an exact match to the original material colors. The inspector must use their best judgement and professional common sense when determining whether this is an acceptable repair or not.

- E. MULTIFAMILY HOUSING (MF) AND OFFICE OF HEALTHCARE PROGRAMS (OHP).** Office of Multifamily Housing (MF) and Office of Healthcare Programs (OHP) properties are identified by their distinctive property ID which is always 9 integers in length beginning with an “8” (e.g. 800001234).
- F. PUBLIC HOUSING (PIH).** Office of Public and Indian Housing; the REAC is an office within PIH. PIH properties are identified by their distinctive Development number that starts with two letters representing the state or US territory where the housing authority is located.
- G. PROFESSIONAL COMMON SENSE.** This is a common-sense approach that inspectors are to use when conducting inspections. It includes exercising sound, practical, and prudent judgment based on the HUD physical inspection training and the inspector’s experience. Professional common sense is to be applied in conjunction with REAC guidance, UPCS protocol, and UPCS definitions.
- H. REAC TAC REFERENCE NUMBER.** An identification number provided by the REAC TAC, given as necessary, to all inspectors for various issues. In some instances, an inspector will need to include the REAC TAC reference number to successfully upload an inspection. The number for the REAC TAC is 888-245-4860.
- I. SERVICING MORTGAGEE.** A mortgage company approved by HUD to service HUD assisted or insured mortgages. Servicing mortgagees are required to have the properties in their HUD portfolio inspected by HUD certified inspectors using the UPCS inspection protocol.
- J. 504 UNITS.** Refers to Section 504 of the Rehabilitation Act of 1973: These are units specifically designed for physically impaired residents.

## GENERAL INFORMATION

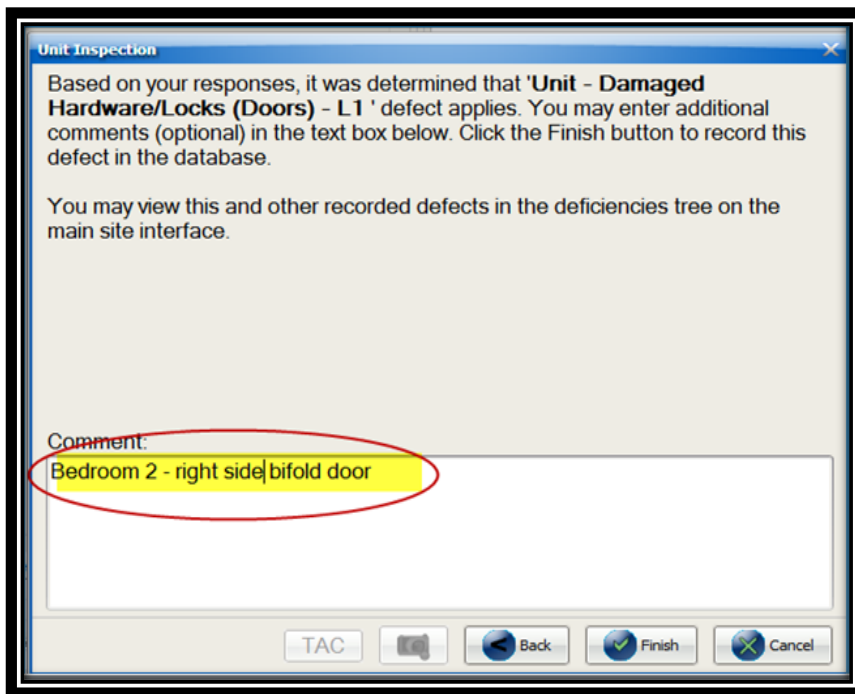
### A. CERTIFICATES

1. **Boilers:** A required boiler certificate may be issued by a city or state government agency, insurance company, or any other entity that has jurisdiction and/or authority to issue such a certification. During the inspection, the inspector must record “NO” until the certificate is presented. For example, if the inspector requests the certificate when in the property representative’s office and the certificate is in the boiler room, the inspector records “NO” until the boiler room is inspected and the inspector reviews the certificate. At which time the inspector should adjust their response accordingly.
2. **Fire alarm systems** must be inspected by a local authority having jurisdiction or a licensed third party. The certificate must be legible and dated within one year of fire alarm system inspection.
3. **Lead Base Paint (LBP) Disclosure Form and Inspection Report:** Inspectors are required to request the LBP disclosure form and inspection report from the property representative for all properties, regardless of the type of resident population, for buildings constructed prior to 1978. A comment must be provided in the Development (PHA)/Property (MFH) Comments field located on the Development (PHA)/Property (MFH) screen regarding resident population (e.g.” Elderly, no residents under the age of 6”). To determine whether the LBP disclosure form and inspection report is applicable, the inspector must use the building construction year and not the date of “complete rehabilitation” or other renovations. The inspector must randomly select five resident files to determine whether the required LBP disclosure form has been provided to and signed by the residents. All five files must contain evidence or the inspector must record “NO.”
4. An acceptable Lead-Based Paint Inspection Report Will specify “Lead Base Paint Inspection” not “Risk Assessment” on the cover page. It shall be property specific (property name / address). Inspection performed by a licensed third party. Shall include the entire property – not just a sampling of the building/units. Below are the detailed instructions for how to record the Lead- Based Inspection Report information in the DCD:
  - If the property was built in 1978 or after, select “NA” for LBP Inspection Report.
  - If the property was built prior to 1978 but does not have the LBP Inspection Report, select “No”.
  - If the property was built prior to 1978 and has a valid LBP Inspection Report, follow the steps below to record and photograph this information.
  - Step 1: Select “Certificates” in the 4.0 inspection software. If the property was built prior to 1978 and has a valid “Lead Base Paint Inspection Report” – select “Yes”.
  - Step 2: Once you have completed the Property Information, Generate the inspection sample
  - Step 3: Select “Site” in the Navigator screen
  - Step 4: Select “OD” in the Health & Safety area of Site to enable a photo to be taken.
  - Step 5: Select a building, if multiple buildings are on the property - select the first building.
  - Step 6: Select “Hazards” from the items listed
  - Step 7: Select “Lead Hazard Report” from the list provided
  - Step 8: Enter required comment
  - Step 9: Select camera icon and take photo of the LBP Inspection Report cover page
  - Step 10: Save photo and select “Finish” (Deficiency should appear in list of deficiencies)

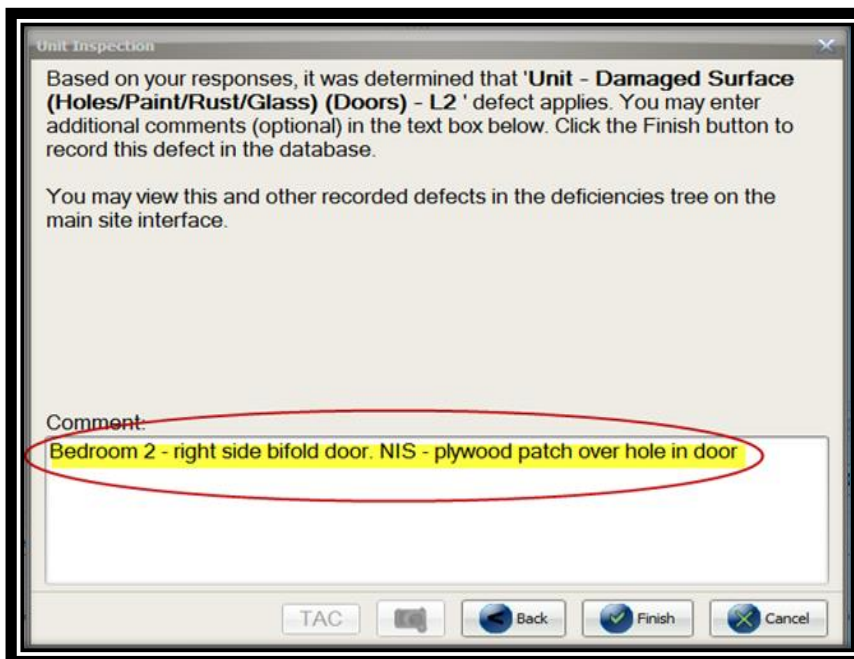
### B. CONDUCTING INSPECTIONS

1. All inspectors are required to conduct a REAC inspection by following the same protocol and guidance, and adhering to the following, as well as the Inspector Administration (IA) Business Rules and Notices and the Reverse Auction Program (RAP) Business Rules and Purchase Order Terms and Conditions.

2. Inspectors must inspect all five inspectable areas for each property: Site, Building Exterior, Building Systems, Common Area and Unit, except for mobile home parks. (See MH Park guidance on page 25)
3. Inspectors are required to record all Health and Safety (H&S) deficiencies observed during the inspection. All Health and Safety deficiencies must be recorded when observed whether located in areas selected for inspection or not. This includes buildings not in the sample and structures that do not meet the REAC definition of a building. Exigent Health and Safety (EH&S) deficiencies observed on non-sample buildings, units, and structures will be recorded as [Site, Exterior or Common Area], [Health and Safety], [appropriate building, nearest building or floor level], [Hazards], [Any Other - This Does Pose a Risk of Bodily Injury]. For deficiencies observed on structures that do not meet the REAC definition of a building, assign the deficiency to the nearest building and provide the specific location and appropriate description in the optional comments field. These deficiencies must be included on the EH&S form.
4. Inspectors must download the inspection prior to arriving at the property.
5. Inspectors must use the most current version of the Data Collection Device (DCD) software, and be proficient in the use of the software.
6. Only the inspector of record can conduct the REAC inspection, including observing and physically testing inspectable items, as well as recording and calling out all deficiencies.
7. Inspector Notice No. 2016-02, A certified inspector providing independent consulting services of any kind on behalf of the property owner or representative is no longer permitted to attend an inspection, or participate in an inspection of record in any capacity.
8. Inspectors must accurately record the property profile in the DCD before sample generation.
9. Inspectors must properly identify and record all observations at the time they are observed using the following: No Observed Deficiency (NOD), Observed Deficiency (OD), or Not Applicable (NA.) In the rare situation that a Site or Unit inspectable item does not exist and there is no NA option in the 4.0 software; record that inspectable item as NOD and provide an appropriate comment explaining that the item does not exist. The comment must be included in the Building Comments field on the Building Information screen for Unit items or in the Site Comments field on the Area Measurements window for Site items.
10. A tape measure, flashlight, and a means to test inspectable devices up to 8 Feet, are the minimal tools required during all REAC inspections. The inspector will not carry any type of testing equipment such as: GFCI tester, Canned Smoke, etc.
11. Additional Comments
  - a. Any time the deficiency [Health and Safety], [Hazards], [Any Other - This does pose a risk of bodily injury] in any of the five Inspectable areas is selected, the Comments field must be used to provide a clear location (if not already clear from the decision tree) and description of the condition observed.
  - b. For any deficiency recorded, (including NIS) the Comments field must be used if the location and/or condition are not fully described by the decision tree selected. This expressly applies to any Exigent Health and Safety item observed to assist the property in making timely repairs. See examples below:



- c. The inspector will enter “NIS”, meaning Not Industry Standard, in the comments field for each deficiency that the inspector records due to the substandard repair and will provide a detailed comment for each explaining the circumstances for the NIS recording. This will allow REAC to track where and how many times these types of issues occur. See an example of an appropriate comment below.



- d. Inspectors must record all deficiencies observed regardless if a similar existing deficiency was already - recorded in the same building/unit. Use the optional comments field to specify the location for duplicate/similar deficiencies.



12. Recording Deficiencies:
  - a. All deficiencies must be recorded in the DCD at the time they are observed. The exception is when a Site, Building Exterior, Building Systems, or Common Areas deficiency is observed while inspecting a unit (e.g. sprinkler head damage). In these cases, the inspector must complete the unit inspection and record the deficiency after the "Exit Unit" button is selected in the 4.0 software.
  - b. Unit: The inspector must complete inspecting a unit before moving on to another unit.
  - c. Site, Building Exterior, Building Systems, and Common Areas: Each inspectable building and site area must be immediately recorded in the UPCS software as the inspection of that area is completed.
  - d. Do not take written notes for the purpose of entering information in the DCD after leaving the unit or property. Record all "NAs" and "NODs" before leaving the unit, the building and/or the property.
13. Utilizing RAPID 4.0 Photo Software:
  - a. Currently, photos are required to be taken and saved for all severity Level 3 (L3) defects and H&S deficiencies only.
  - b. Inspector must make sure that No person or easily identifiable information appears in any photo.
  - c. At least one photo is required that clearly depicts the cited deficiency and can withstand a second party verification. If additional photos are needed to fully illustrate the observed condition, RAPID allows the user to save a maximum of three photos per deficiency.
  - d. Photos of inoperable item deficiencies (e.g. Smoke detectors, GFCI outlets, a door that will not latch, etc.) need only show the inoperable item. Inspectors should not attempt to demonstrate the defect in the photo.
  - e. If a photo cannot be captured for an L3 defect, the inspector must obtain a TAC Number in order to continue the inspection. Inspector can submit an Area Specific TAC or Global TAC.
    - 1) Area Specific TAC - Inspector is unable to take a photo for a specific area (e.g., Building System, Unit) in that Building (e.g., Building 1). Area Specific TAC reasons:
      - a) Hazardous Condition – Area Specific (No Photo)
      - b) Occupant Refusal – Area Specific (No Photo)
      - c) Restricted Area – Area Specific (No Photo)
      - d) Weather – Area Specific (No Photo)
    - 2) Global TAC - Inspector is unable to take a photo for L3 defects for the remainder of the inspection. Global TAC for the Camera Malfunction or Software Malfunction options below will be rare as closing and re-starting the RAPID 4.0 Photo software will re-initialize the camera function and allow the inspector to continue to take the required photos. Global TAC reasons:
      - a) Camera Malfunction – All Inspectable Areas (No Photo)
      - b) Software Malfunction – All Inspectable Areas (No Photo)
      - c) Property/Owner Refusal – All Inspectable Areas (No Photo)
14. The inspection must be complete before leaving the property. Ensure that all nodes are green, use the "Check for Incomplete Items" button, and check the "Finish Inspection" box on the Inspection screen before leaving the property. If the "Check for Incomplete Items" button function is executed after leaving the property and missing information is discovered, the inspector must return to the property to complete the inspection. Please note that once the "Finish Inspection" box is selected, the inspection can no longer be edited. Do not edit the report after the inspection is completed. Timestamp data will reflect any action recorded after the inspection is complete and may cause the inspection to be held up or rejected.
15. In addition to the DCD an inspector is required to have the following minimal essential tools: a tape measure, flashlight, and a means to test inspectable items 8' and below. Inspectors are required to

inspect all inspectable items and areas without assistance from property representatives except for those items specifically noted.

- a. Operable windows with their locking mechanisms at 8' or higher from the floor or landing are no longer required to be inspected for correct operation, but a visual inspection must be conducted by the inspector for broken/cracked glass, seal damage, etc.



- b. Except for these windows, testing is required for all other inspectable items, including those that are positioned over eight feet in height above the floor wherever they are located, including cathedral or vaulted ceilings.
  - c. The property representative shall perform testing in the visual presence of the inspector for smoke detectors and all inspectable items, except windows, over eight feet in height above the floor (these inspectable items include, but are not limited to smoke detectors and emergency lighting).
  - d. Except for windows, all other inspectable items over eight feet in height above the floor that are not tested must be recorded as OD.
  - e. The property representative will also assist in testing all ovens and stoves in the presence of the inspector. (See page 69 or page 87 for the complete oven/stove testing policies)
  - f. While conducting an inspection, an inspector is not to open closed bathroom or bedroom doors within a unit. The resident, if present, or property representative is responsible for providing access to all inspectable areas.
16. All components that exist on a property that are in place for active service must function as designed or they are evaluated as deficient under the UPCS protocol. The following protocol applies for items that the POA has taken offline or out of service and evidence of the previous item still exists:
- a. All items must be evaluated for Health and Safety deficiencies regardless of whether the inspectable item is in service or off-line.
  - b. If there is any doubt that the building component is still in service or might be brought back on-line anytime in the future, the inspector must evaluate the component as inoperable. Components that have not been taken out of service must be evaluated for deficiencies under the UPCS

protocol. An example of an item that would be noted as deficient are trash chutes that the POA reports as abandoned, however one or more of the chute doors have not been permanently sealed shut.

- c. Building components that have been replaced and have not been removed because they are too large and/or expensive to remove from a building will not be evaluated as inoperable if the POA has clearly endeavored to take the item permanently off-line. Examples would be trash chutes where all doors have been welded shut, large boilers in a building's basement, and old service elevators that have been obviously disabled and are no longer in use.
17. A property representative must accompany an inspector throughout the entire inspection.
    - a. If a property representative does not show up for the inspection, the inspector must secure a REAC TAC reference number immediately and report the inspection as unsuccessful.
    - b. If the property representative leaves an inspector alone, the inspector must wait in an open public area or property office for the representative to return before resuming the inspection.
    - c. If a property representative fails to accompany the inspector throughout the entire inspection (i.e., leaves and does not return), the inspector must secure a REAC TAC reference number immediately and report the inspection as unsuccessful.
    - d. An inspector is to inspect no more than the total number of sample units generated by the UPCS software. If an inspector cannot meet the sample size after using all sample units and alternates, they must immediately contact REAC TAC and secure a REAC TAC reference number.
    - e. If an inspector suspects that the property is sending personnel into inspectable areas ahead of the inspection for the purpose of repairing possible deficiencies, the inspector is to first request that the practice be terminated. If the problem persists, the inspector must immediately secure a REAC TAC reference number and report the inspection as unsuccessful.
    - f. Prior to or during the inspection, an inspector must not share sample building or unit numbers with property representatives 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, the property representative may be provided with a list of sample units for the purposes of pulling keys only.
    - g. To maintain statistical validity, it is important to select the sample units and alternates in the order in which they are displayed in the 4.0 software under the Navigator section (or the Building screen, Unit Information section). 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.
  18. 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, they may contact the REAC TAC at any time during the inspection.
  19. Limited Quality Assurance (LQA) reviews are used to determine if a recently completed inspection conducted by an inspector is a true representation of the physical condition of the property at the time the inspection took place. The focus is on verifying the quality of the inspection as well as assessing the inspector's performance.
  20. Quality Control Inspection (QCI) is a review process that requires a PASS-QA inspector to conduct a second inspection of the same property. This allows REAC to determine if the UPCS protocol was followed and possibly eliminate the need of a third inspection.

**C. CAUSE AND/OR EFFECT: TWO DEFECTS IN SAME AREA – ONE CAUSED THE OTHER.**

1. If one deficiency creates another deficiency that is not an H&S, the inspector will record either the cause or the affect – but not both. For example, if you see both cracks/gaps and missing

pieces/holes/spalling in the same area of an exterior wall, do not record both, record only one of the two, either the “cause” or the “affect”, whichever is the higher-level deficiency of the two.

2. However, if an inspectable area deficiency also causes a Health and Safety (H&S) deficiency, the inspector must record both the “cause” and the “affect”. For example, a broken window pane creates an H&S sharp edge – record both.
3. In the 4.0 software inspectors are required to record every observed deficiency of the same type regardless of the number of times it is observed. If the defect is of the type that is cumulative, the inspector will record each individual defect until it reaches the threshold for the next level. At that time the inspector will select the next level deficiency and enter a comment detailing the exact locations for each of the individual observations for this deficiency. (Some examples of cumulative inspectable items are: Site -Graffiti, Unit – lighting, Systems – Fire Extinguishers)

#### **D. NOTIFICATION OF EXIGENT AND FIRE SAFETY HAZARDS OBSERVED (EH&S FORM)**

1. At the conclusion of the inspection, or at the conclusion of each day of a multi-day inspection, inspectors are required to leave only the completed Notification of Exigent and Fire Safety Hazards Observed (EH&S form) with the property representative. The inspector shall not provide any other document to the property representative.
2. Inspectors must obtain a signature from the property representative on the EH&S form prior to leaving the property. If the property representative refuses to sign acknowledging receipt, the inspector is to note such refusal on the form and maintain on file for six months, as evidence of delivery to the property representative. HUD may request the inspector to provide the EH&S form at any time during the six-month period following the inspection.
3. Inspectors may use either the current handwritten or Rapid 4.0 generated copy of the EH&S form. The requirements listed above must be adhered to regardless of the version used. If the inspector uses the electronic version of the EH&S form the following requirements also apply:
  - a. Digital signatures are not permitted. Inspectors must print off the report and obtain the signature of the POA on the hardcopy form prior leaving the property at the end of each inspection day.
  - b. The 4.0 software will print off all EH&S deficiencies regardless of the day they were observed. On second and subsequent days of multi-day inspections, the inspector must include the date each deficiency was observed in the right margin of the EH&S report prior to obtaining the POA’s signature. This is not required for a one-day inspection or for the first day of a multi-day inspection.
  - c. Inspectors must always be prepared to generate a hard copy of an EH&S report in the event of technical issues that may arise in the field.
  - d. Inspectors can use their own printer or may request that the POA print off a copy of the DCD 4.0 generated EH&S report. Use of the POA’s equipment to generate the electronic EH&S form is solely for the benefit and convenience of the property. The POA’s cooperation in the printing of the form is entirely voluntary and in no way to be considered a requirement. Inspectors must always be prepared to produce a copy of the EH&S form without outside assistance.

#### **E. OBSERVED DEFICIENCIES**

1. Inspectors are required to call out all observed deficiencies, to include the inspectable area, item, deficiency, location and level of severity to the property representative during the inspection. If the property representative becomes argumentative regarding deficiencies during the inspection, the inspector must call the REAC TAC and secure a REAC TAC reference number and then may complete the inspection without calling out the remainder of the deficiencies.

#### **F. OCCUPANCY PERCENTAGE**

1. The number of occupied units must be verified from the all-inclusive list and cannot be based solely on the property representative(s) representations.

#### **G. OFFICE EQUIPMENT AND RESIDENT RESOURCES**

1. Inspectors must not use any property office equipment. This includes telephones, fax machines or other office equipment at any property. Exception: the inspector may request that the POA print off a copy of the EH&S report.
2. Inspectors must not use any HUD field office equipment for downloading, uploading, calling or faxing documents.
3. Inspectors must not use the electrical outlets of a resident's unit for any reason. However, with the property representative's permission, the inspector may use an outlet to power the DCD or recharge DCD batteries only in the office.
4. Inspectors are not allowed to use occupied unit bathrooms or the use of resident's furniture to take breaks.

#### **H. CONFLICTS OF INTEREST**

1. Provisions covering conflicts of interest can be found in the Reverse Auction Program Business Rules and Purchase Order Terms and Conditions.

#### **I. PROPERTY PROFILE AND VISUAL VERIFICATION** (Note: it is strongly recommended that all inspectors utilize the HUD REAC Inspection checklist)

1. Visual Verification: While on-site the inspector must walk and/or drive the property with the property representative to get into a position to view all sides of each building and visually verify the entire property for building counts, building types, structures that may meet REAC's definition of a building, area measurements, and property lines prior to sample generation.
  - a. In the case of scattered site properties, inspectors are required to visit all property locations to visually verify all building and unit counts prior to sample generating.
  - b. Only properties that are to be inspected on the same day, by the same inspector, may be visually verified at the same time.
2. Profile Verification: The inspector shall contact REAC TAC prior to generating the sample to verify HUD's interest on the property for both Multi-family and Public Housing. While on-site with the property representative confirm all profile, information including, but not limited to participant, certificate, area measures, building/unit information utilizing the all-inclusive list, etc. Adding and editing of this information, if necessary, is to be done prior to sample generation.
3. Inspection data discovered to be in error during the inspection may be edited as necessary except for the building and/or unit count. If the building and/or unit count differs from the inspection download, the inspector must contact REAC TAC immediately. In most cases, REAC TAC will provide a REAC TAC reference number allowing the inspection to continue.
4. If an inspector receives new information from the REAC TAC on a profile change, the inspector must make the necessary correction and provide a clear comment explaining the change under the Building Information screen in the Building Comments field. The inspector is to record the REAC TAC reference number, reason, and comment in the TAC box located in the inspection menu.
5. All building data must be correct. If the unit/building count is not correct, and it is the fault of the inspector, the inspector's performance will be rated as "Outside Standard" during a CQA or LQA review.
7. Each building must have a unique "Building Name" that should be consistent with how the property identifies each building.
8. Each building must have a unique address consistent with how the property identifies each building address.

## J. PARTICIPANTS

1. For properties that do not have three unique participants, the same person can be listed more than once with different roles. All attempts should be made to include three distinct individual participants.
2. One of the listed participants must actively participate in the inspection.
3. Inspection Participants are limited to the appropriate property representatives/escorts.

## K. RESCHEDULED/UNSUCCESSFUL/CANCELLED INSPECTIONS

1. Inspections are to be conducted at the scheduled time and date. If the inspector needs to reschedule an inspection for any reason, the inspector must do so at the earliest opportunity possible. PHA staff, multifamily owners/agents and QA inspectors plan their calendars around that commitment.
2. Cancellations:
  - a. Inspections should not be cancelled within three (3) business days if at all possible.
  - b. Inspector: If an inspector must cancel an inspection within three (3) business days of the scheduled start time due to an unexpected emergency, severe weather advisory, or sickness, it is the inspector's responsibility to notify the REAC TAC immediately and secure a REAC TAC reference number for the subject cancellation. The inspector must also notify the property representative immediately.
  - c. POA: If a POA does not show up, cancels or wishes to reschedule a scheduled inspection, the inspector must call REAC TAC, and secure a REAC TAC reference number for the subject cancellation.
  - d. Inspectors must reschedule any inspection for which residents have not been notified, unless receiving permission to proceed with the inspection from REAC TAC. The inspection will either need to be rescheduled or reported as unsuccessful if the property representative cannot provide the appropriate access.
  - e. Excessive cancellations and rescheduling by inspectors will be subject to Inspector Administration (IA) review.

## L. SCHEDULING

1. Inspections are to be performed during the property's normal business hours on Monday through Friday. Normal business hours will vary from property to property. It is the inspector's responsibility to ascertain the hours of business and operating policies for such time periods as scheduled breaks, lunch time, and quitting time before scheduling the inspection and consider their impact when preparing the inspection schedule.
2. Inspections may not be scheduled or conducted on Federal holidays or on any other holiday during which time the property will not be open for normal business.
3. Inspections may begin at any time during normal business hours on which the property representative and inspector **mutually agree**. A morning inspection usually begins no later than 9:00 am and an afternoon inspection usually begins by 1:00 pm. Inspectors must conclude the day's inspections before the end of the property's business day.
4. Inspection of site and building exteriors must be concluded during daylight hours.
5. Inspectors should not enter units prior to 9 AM or after 6 PM.
6. If the inspector is unavoidably delayed, the inspector should call the property representative as soon as they know they will be late. If the inspector is going to be more than 60 minutes late, the inspector must notify REAC TAC and secure a REAC TAC reference number, and will be OS for scheduling.
7. The inspector must also notify the REAC TAC if for any other reason, the date or start time differs from the date or start time specified in the Scheduler application within the REAC Secure Systems. If this does not occur the inspector will be OS for scheduling.
8. If an inspection cannot be completed in one day, it must be completed during the next business day before the inspector can start a second inspection.

- a. When a servicing mortgagee inspection cannot be completed on consecutive business days, the inspector must secure a REAC TAC reference number.
- b. If an inspection procured through the Reverse Auction Program (RAP) cannot be completed on consecutive business days and the inspection was properly scheduled based on the estimated duration provided by HUD, the inspector must secure a REAC TAC reference number for an unsuccessful inspection. If the inspection was not scheduled based on the estimated duration provided by HUD, the inspector must secure a REAC TAC reference number for a rescheduled inspection that will be conducted at a later date. The contractor must contact RAP through email prior to the rescheduled date for additional information and guidance.

**M. SEVERE WEATHER POLICY**

1. Inspectors are not to inspect a property if a “severe weather warning” is in effect and must notify the REAC TAC immediately and secure a REAC TAC reference number. A severe weather warning 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 warning has been issued.

**N. SNOW POLICY**

1. In the absence of a severe weather warning, inspectors are to attempt to inspect all properties, regardless of the amount of snow. Any inspectable items not visible due to snow are then recorded as “No Observed Deficiency” (NOD). In the Development (PHA)/Property (MFH) Comments field located in the Development (PHA)/Property (MFH) screen, provide a comment indicating which items were hidden by snow.

**O. SYSTEMS DESIGNED FOR OFF-SITE NOTIFICATION/MONITORING**

1. If the property can provide current (within one year) documentation from a local authority having jurisdiction or a licensed third party supporting the testing of a system designed for off-site notification/monitoring (call-for-aid, smoke detector, etc.) the inspector does not need to inspect the individual components and all should be marked “NOD”.
2. If the property cannot provide the proper documentation and cannot put the equipment into a “test mode” for inspection purposes, all relevant items should be marked “OD”.

**P. UPCS SOFTWARE**

1. Sample buildings may be generated that contain no sample units. For these sample buildings, only Building Exterior, Common Areas, and Building Systems will be inspected.

**Q. UPLOADING INSPECTION DATA**

1. Inspectors must upload inspection data to REAC within 24 hours of the time the inspection was completed. If the inspection cannot be uploaded for technical reasons, the inspector must immediately contact REAC TAC to secure a REAC TAC reference number.
2. Successfully uploaded inspections shall not be deleted until the inspection is accepted by HUD and is authorized for payment. It is strongly recommended that inspectors save a backup copy of inspection files on their computer until each inspection is accepted in “Inspection Review” and authorized for payment.
3. If TAC is closed due to unforeseen circumstances, such as weather, please follow the following procedures:
  - a. Do not select the “Finish Inspection?” button or upload the inspection until the inspector receives the necessary TAC numbers. If a TAC number cannot be obtained before having to start another scheduled inspection, the inspector should place the inspection into Review Mode, which will allow another inspection to be opened until the necessary TAC numbers are received and recorded in the 4.0 software.

- b. Get an additional TAC number for a late upload if the inspector is not able to upload the inspection within 24 hours after completion.

#### R. WORK IN PROGRESS

1. If buildings or units are vacant (temporarily off-line) due to rehabilitation work in progress, they must remain in the building/unit count. If a vacant building is selected as a sample building, visually verify that it is vacant and select an alternate. If a vacant unit is selected as a sample unit, visually verify that it is vacant and select an alternate unit (see the comments under "Vacant Unit Policy," Multifamily Housing and Office of Healthcare Program on page 29 for an exception).
2. If buildings or units are occupied and rehabilitation work is in progress, the inspector must inspect the buildings or units, recording all deficiencies.

#### S. SMOKING POLICY

1. The Inspector is not allowed to smoke or use tobacco products including e-cigarettes, anywhere on the proper

## BUILDINGS AND UNITS

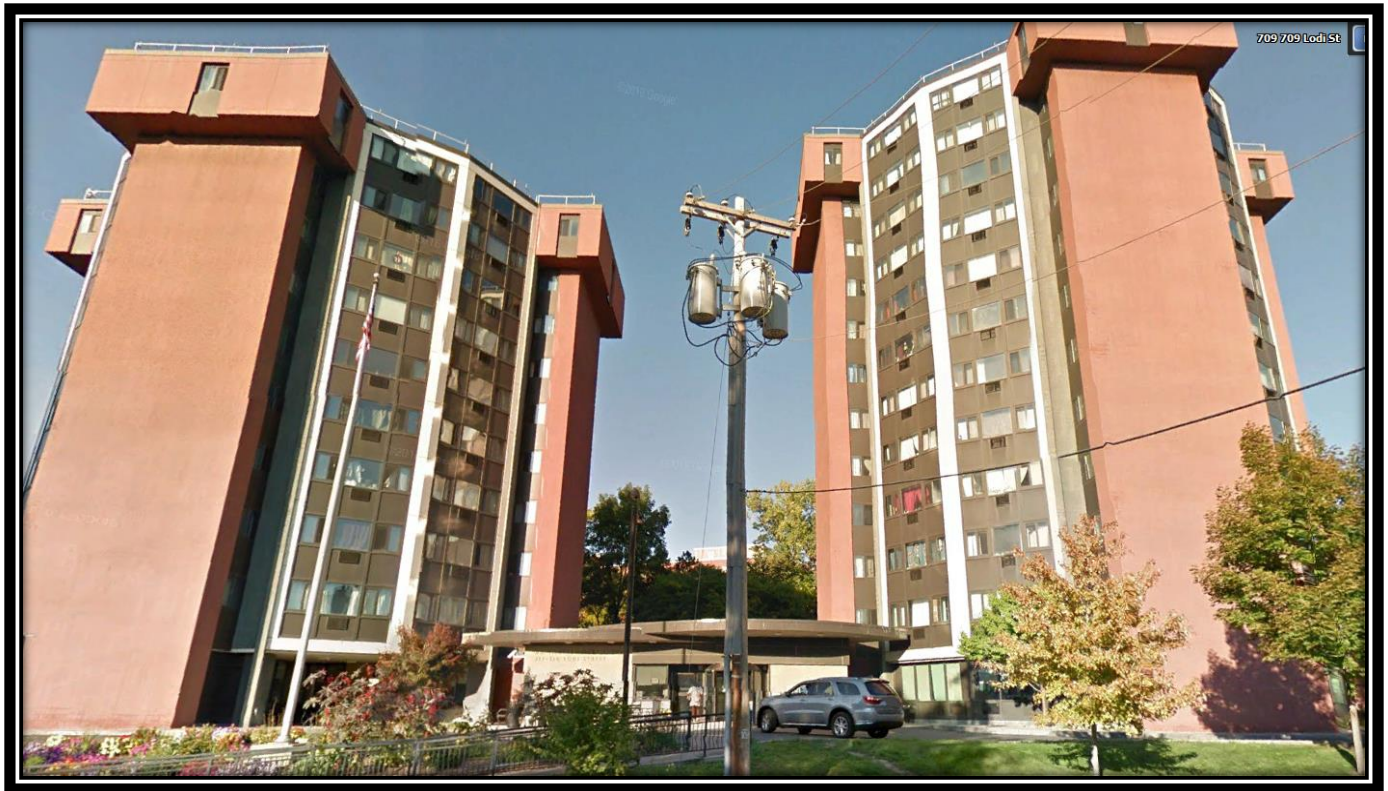
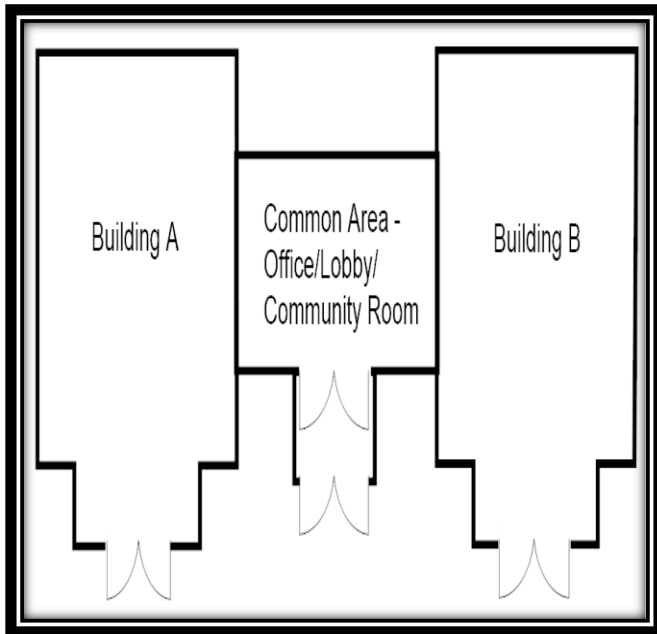
### A. BUILDING

*Building Definition: An individual building is any structure that has a contiguous roofline, a permanent foundation (including pier foundations poured to bearing soil and below frost line), is enclosed on all sides and has at least one utility servicing it such as electric, gas, water, or sewer.*

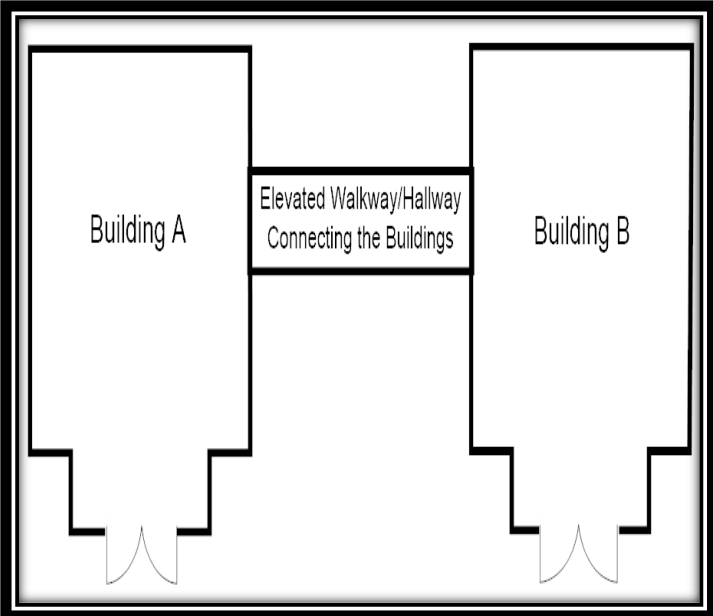
1. When determining the "Contiguous Roofline" for multiple connected structures with varying roof elevations, the roof over the following connecting common areas **shall not** be included in determining the number of buildings: hallways, stairways, covered patios/porches, canopies, covered walkways, etc. The defect(s) observed in these common areas should be recorded in the nearest attached structure or the lowest alphanumeric named building.
2. Building type: To determine the building type the inspector will first use the exterior building design/layout, and then if necessary, the unit counts to determine the building type. Exception: The "building type" category for a group home located in a converted single-family house is "Walk-up/Multifamily Apartments" or "Elevator Structure," as applicable.



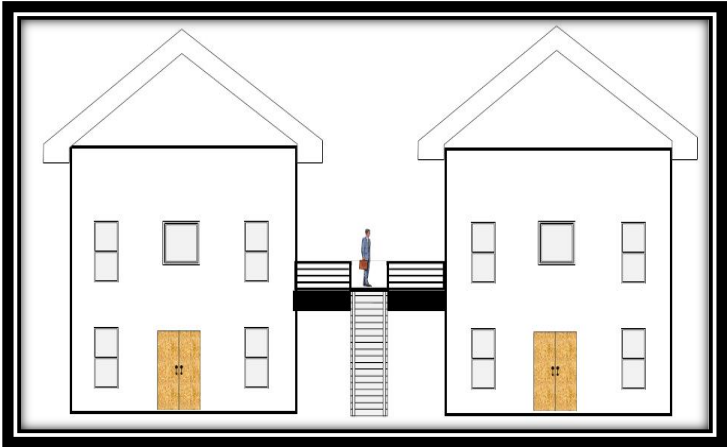
Example 1: Regardless of the type of common area connecting the structures it is **two buildings**.



Example 2: Regardless if the crosswalk is enclosed or open, this configuration is **two buildings**.



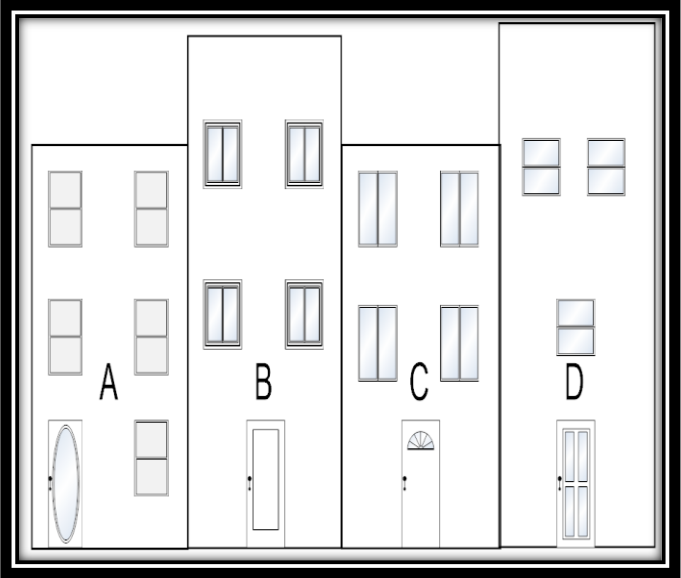
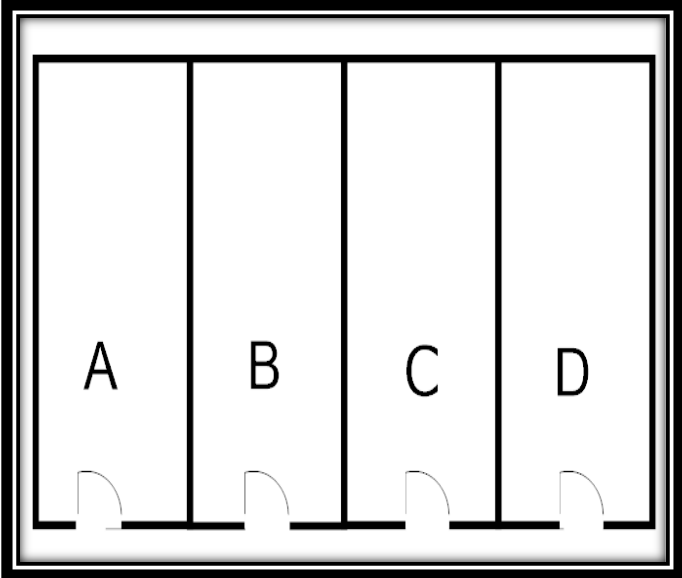
Example 3: Regardless if the walk is enclosed or open, this configuration is **two buildings**.



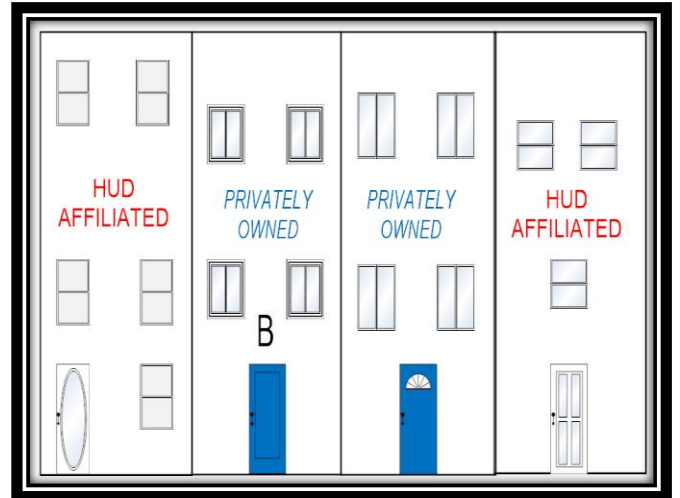
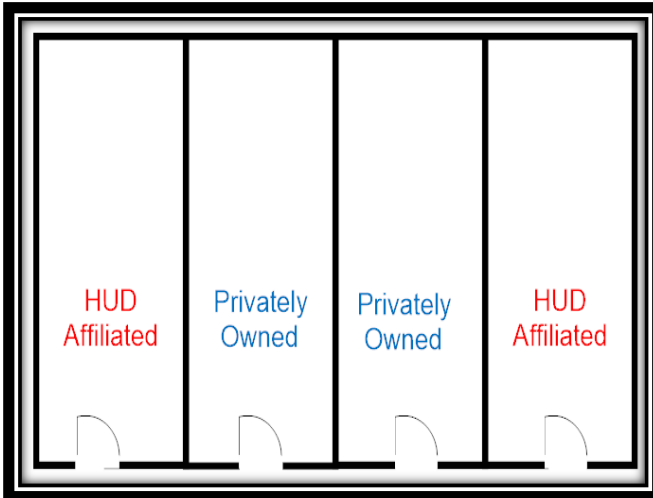
Example 4: A contiguous roof on the same elevation that covers the entire structure, regardless if a common area stairway or breezeway passes through it, are to be recorded as **one building**. This is typical design of a lot of Garden style apartments in HUD's portfolio.



Example 5: A contiguous roof that is **not** separated by a common area, regardless of the varying roof elevations, shall be considered one building. This configuration is **one building**.

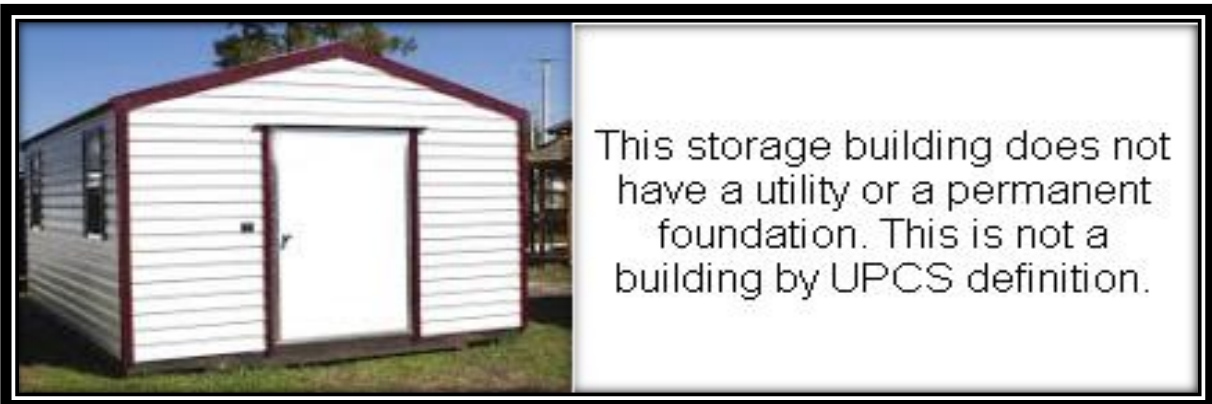


Example 6: Multiple connected structures that are separated by privately owned structures that are not part of the property profile, regardless of building type, such as row/townhouse, highrise, etc. shall be considered **one building**. (These privately owned structures will not be inspected.)



The foundation is not considered permanent if the structure is for example, on skids, or if it is a wooden foundation whereby the structure might easily be picked up with a piece of equipment and relocated. Structures brought onto properties on wheels, such as a mobile home, are not considered a building. However, if an Exigent Health and Safety deficiency is observed on the structure, it should be recorded as [Site], [Health and Safety], [nearest building], [Hazards], [Any Other - This Does Pose a Risk of Bodily Injury].

Below are examples of structures that **do not** meet our definition of a building are:



## B. BUILDING TYPE

1. The UPCS 4.0 software lists the following building types:
  - a. Non-Dwelling Structure (formerly "Common Building"): A detached non-residential structure.
  - b. Semi-Detached (formerly "Duplex"): A detached residential structure consisting of two units.
  - c. Walk-up/Multifamily Apartments: A multi-unit residential structure with a common hall entrance regardless of the number of floors and no elevator.
  - d. Elevator Structure: A residential structure with an elevator.
  - e. Row or Townhouse: A single unit residential structure that is connected to a similar structure by a common sidewall with an individual exterior unit entrance.
  - f. Single-Family/Detached: A detached residential structure consisting of one unit.
2. Group Home: The "building type" category for a group home located in a converted single-family house is "Walk-up/Multifamily Apartments" or "Elevator Structure," as applicable.
3. For building(s) with both HUD assisted and non-assisted unit(s), the building type should be identified by the way the building was constructed, regardless of how many units receive HUD assistance (i.e., If a building is a duplex, but contains only one HUD assisted unit, the building type is "Semi-Detached" not "Single-Family/Detached").

## C. SCATTERED SITE

1. A Scattered Site can be defined as a property with multiple locations around a town, city, county, or state. To complete the inspection in the most efficient manner it will be necessary for the inspector to drive from one location to the next.
2. Scattered Site Policy: Inspectors are required to visit all property locations to visually verify all building and unit counts prior to sample generation. After generating the sample and selecting the sample buildings and units, inspectors are only required to re-visit and inspect the sample buildings and units and the sites associated with the sample buildings. If any building is selected as part of the sample on a multiple building location, the entire site for that location must be inspected.
  - a. Example #1 (One building per location): An inspector visually verifies a scattered site property and finds that the profile consists of 44 buildings and 80 units scattered over 40 different locations throughout the city. The inspector updates the property profile, generates the sample, and the software selects a sample of 20 buildings and 20 units. The inspector is required to re-visit and inspect the sites associated with only the 20 locations selected as part of the sample and does not have to re-visit the remaining 24 locations.
  - b. Example #2 (Multiple buildings at one location): An inspector visually verifies a scattered site property and observes that the profile consists of 20 buildings and 40 units scattered over 16 locations with 15 locations having a single building and one with five buildings). The property information is updated and the sample is generated with 16 buildings and 16 units in the sample, 11 single-building sample locations and one location in the sample with five buildings. When the inspector arrives at each of the 11 single-building locations they must inspect the site around that building. However, when the location with five buildings is inspected, the entire site must be inspected, including the site around the buildings not in the sample. The inspector is not required to re-visit the four remaining scattered site locations.



#### **D. MOBILE HOME PARKS**

1. When inspecting a Mobile Home park where there are no buildings that meet REAC's definition of a building, select "Site Only" for the Inspection Type on the Inspection Screen and proceed to only inspect the site associated with the property.
2. If there are non-residential building(s) on the property that do meet REAC's definition of a building, select "Site/Building Only" for the Inspection Type on the Inspection Screen and proceed to inspect the Site associated with the property and the non-residential building(s).
3. If there are residential structures on the property that meet REAC's definition of a building, then select "Standard" for the Inspection Type on the Inspection Screen. Prior to generating the sample, the building and unit profile should include only the buildings that meet the definition of a building and the unit counts associated in those buildings.

#### **E. BUILDINGS: FREE-STANDING OR ATTACHED STRUCTURES**

1. 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, garage, or carport is a freestanding 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, garage, or carport is a freestanding common building, inspect it as an individual common building and record deficiencies, as applicable (see "c." above for an exception).
  - e. If a storage shed, garage, carport, or other freestanding structure does not meet the definition of a building, do not inspect it as a building. However, if an Exigent Health and Safety deficiency is observed on the structure, it should be recorded as [Site], [Health and Safety], [nearest building], [Hazards], [Any Other - This Does Pose a Risk of Bodily Injury].

#### **F. BUILDINGS OFF-LINE**

1. During an inspection, the inspector may find that some buildings are off-line.
  - a. Permanent Off-Line Buildings
    - 1) These are buildings that the property has taken off-line permanently and are no longer included in the rent roll (e.g. a building scheduled for demolition). These buildings are normally boarded-up and isolated by fencing/wires.
    - 2) The following options should be used to take a building permanently offline. If any of these options are selected, the building and unit's counts will not be counted in the "Actual" counts on the Profile information screen. All permanently offline buildings must be verified and recorded as uninspectable prior to sample generation. Recording a building permanently offline after sample generation may affect the total sample size for the property.
      - Added by Mistake
      - Boarded-Up/Permanently Offline
      - Demolished
      - Not Part of Property
      - Sold

**b. Temporary Off-Line Buildings**

- 1)** These are buildings that the property has taken off-line temporarily for rehabilitation activities. These buildings must be 100% vacant and may be boarded-up for security purposes. Include these buildings/units in the profile prior to generating the sample. If the inspector cannot meet the building/unit sample requirements, the inspector must secure a REAC TAC reference number before uploading the completed inspection.
- 2)** The options listed below should be used when taking a building temporarily off-line. If any of these options are selected the building and unit counts will be counted in the “Actual” counts on the Profile information screen. Temporary off-line buildings cannot be taken offline before (prior to) sample generation as this will have a direct effect on the unit sample size for the property, and will result in the inspection being rejected.
  - Boarded-Up/Temporarily Offline
  - Fire Damaged
  - Other Hazards
  - No Access
  - Police Restricted Area
  - Resident Refusal
  - Undergoing Extensive Rehab
  - Vacant

**G. CLARIFICATION FOR OFF-LINE BUILDINGS AND UNITS (PUBLIC HOUSING AND MULTIFAMILY HOUSING)**

**1. Public Housing:**

- a. Permanent Off-Line Buildings/Units: The PHA has set these aside and they are not used (e.g. awaiting action such as demolition, disposition, eminent domain, or abandoned with no plans to bring them back on-line for any number of reasons). These buildings/units are typically boarded up and must be vacant. These buildings/units should not be reflected in the rent roll or other property rental records.
- b. Temporary Off-Line Buildings/Units: The PHA has set these aside and they are undergoing or awaiting modernization or other types of rehabilitation. In all instances, the PHA has plans to bring them back on-line sometime in the future, regardless of how long in the future. These buildings/units may or may not be boarded-up, but must be vacant. These buildings/units are to be included in the rent roll or other comparable property rental records. If the entire building is taken off-line with no sign of maintenance/management activities, the building is considered and recorded as “Vacant”.
- c. Vacant Buildings/Units: Typically, these are buildings/units that are vacant in the normal course of operations due to turnover, legal actions, fire damage, etc.
- d. Multifamily Housing:
- e. REAC inspections typically occur either before or after a property undergoes extensive rehabilitation and should not be scheduled and conducted for properties that have extensive on-going modernization/rehabilitation activities currently in progress.
- f. Permanent Off-Line Buildings/Units: Rarely found in Multifamily Housing properties. If one exists, they are typically buildings/units that have been foreclosed or abandoned and have no HUD interest associated with them. Reference Public Housing above for how to handle. Again, permanent off-line buildings/units are *rarely* identified in Multifamily Housing. The inspector needs to be absolutely sure before identifying a MF building or unit as “Permanent Off-line.”
- g. Temporary Off-Line Buildings/Units: In Multifamily Housing, these are considered/treated the same as vacant buildings/units and are subject to the 15% threshold. The inspector is to inspect these off-line buildings/units if selected as a part of the sample. However, the property owner/agent (POA) may designate buildings/units as temporarily off-line at the time of the inspection and these buildings/units are not subject to the 15% threshold inspection

requirement. The inspector should follow the procedure outlined below when the POA is requesting the exclusion of off-line buildings/units during the inspection:

- 1) The POA must provide to the inspector, on the day of the inspection before verifying the property profile information, a letter from the local HUD Field Office identifying and approving the buildings/units as temporary off-line.
- 2) The inspector must reference this letter in the Development (PHA)/Property (MFH) Comments field located in the Development (PHA)/Property (MFH) screen.
- 3) Buildings/units that are designated and approved as temporary off-line must remain in the building/unit count and the inspector must include them in the property profile when generating the sample.
- 4) After verifying that the building has been approved by the local HUD Office to be taken temporarily offline, select either “Undergoing Extensive Rehab”, “Fire Damage”, “Other Hazards” or “No Access” from the “If the building cannot be inspected, select a reason” drop down menu. Do not select the “Vacant” or “Boarded-Up/Temporarily Offline”; these options are treated the same and may inaccurately require you to inspect the building and units in the building based on the vacancy rate.
- 5) Though not to be inspected, the inspector must record observable Exigent Health and Safety (EH&S) hazards that any off-line building or unit poses to residents under [Site, Exterior or Common Area], [Health and Safety], [appropriate building, nearest building or floor level], [Hazards], [Any Other - This Does Pose a Risk of Bodily Injury].

## H. UNITS

1. Non-Revenue Units (also known as site manager or staff units): These units typically do not produce revenue for the property, are usually occupied by property staff, and may not be shown on the rent roll. For PIH properties and MF/OHP FHA-insured and/or HUD-held loan properties, non-revenue units 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.
2. Nursing and Group Home Units (also known as client rooms): For nursing homes, group homes, and other assisted living facilities, any room with one or more 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/units rather than the number of beds. Because client rooms do not always have assigned numbers, the inspector is to identify each client room by a unique number after consultation with the property representative. The inspector is to start at the lowest level and move to the right, then up through the property to select the 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 or apartment-type dwelling units, the total number of units used to generate the sample will include both.
3. PHA properties with non-HUD units: If a PHA property has a combination of PHA units and units receiving funding from a non-HUD source such as IRS Tax Credit units, the inspector must build the profile based on only the HUD units and the residential buildings where these units are located. In PIC, these units are reported as Annual Contributions Contract (ACC) units. Contact the REAC TAC if there are any questions about the correct unit count or to verify what is being reported in the PIC system. The inspector must also include all common buildings regardless of whether they are used by a resident or not.
4. Multifamily properties that are not HUD insured and do not have an active HUD loan: Some Multifamily Housing properties have HUD assisted Section 8 project-based units and no active HUD

loan. The property representative 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 on multi-family properties with no active HUD loan. Market rate units, non-revenue units and any other type units not receiving Section 8 assistance will not be included in the unit count. However, all other inspectable areas including common buildings used by residents such as laundry buildings, offices, or a community center, and buildings with common areas that have Section 8 units must be inspected in accordance with the UPCS protocol. Do not include buildings that Section 8 residents do not have access to and do not utilize such as maintenance shops or pump houses.

- I. UNIT TYPES.** There are three types of units that are commonly observed within a building:
1. **Occupied Units:** Units presently occupied that must be included in a building's unit count. This may include non-revenue units on the property that are normally occupied by property staff such as a site manager or maintenance staff rent free as part of their compensation.
  2. **Vacant Units:** These are units that have no active lease including temporary off-line units such as fire damaged units and units undergoing rehabilitation. Vacant units must be included in the building's unit count.
  3. **Altered Units:** Also, referred to as permanently off-line units, as explained above are units that have been converted from a dwelling unit use to a non-dwelling unit use such as office, community, and police service spaces. These units are to be removed from the building's Actual Unit Count, prior to generating the sample and the altered spaces are considered as building "common space." It is the inspector's responsibility to correctly verify units converted to common space prior to sample generation. 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 a common area. If this building is not selected as a sample building, the space does not have to be inspected. The inspector is required to confirm with the property representative the existence of any altered units prior to generating the sample. If an altered/off-line unit was incorrectly included in the sample due to an error on the part of the property representative, the inspector records "uninspectable" for the unit and contacts REAC TAC for a REAC TAC reference number before proceeding with the inspection. The status of this unit must be visually verified. If the error is on the part of the inspector, the profile must be corrected and the sample regenerated by the inspector.
  4. **Model Units:** Properties may have a furnished and decorated unit used as a display model for leasing purposes.
  5. If the POA states that this model unit is not for rent it should be considered part of the building's common area and inspected if that building is selected in the sample.
  6. If the POA states that the model unit is available for rent if requested over another vacant unit then it should be included in the unit count and treated as a vacant unit.

**J. VACANT UNIT POLICY**

1. **Multifamily Housing:** For all Multifamily Housing and Office of Healthcare Program properties, vacant units that are included in the random sample will not be inspected unless the property has a vacancy rate of 15% or more. Failure to inspect vacant units at these properties means the inspection will be deemed inaccurate and rejected. Additionally, inspectors are required to follow the procedures for recording vacant units in the DCD. If these procedures are not properly followed, the inspection will be rejected and the property must be re-inspected at no expense to the Federal government. When inspecting vacant units, the inspector should edit the unit in the Building/Unit Information screen. The "If the unit cannot be inspected, select a reason" field should remain blank

and the inspector should enter an appropriate comment in that unit's comment field (e.g. Vacant unit inspected under the MFH 15% rule).

2. If a vacant unit is selected as a sample unit, during the inspection it must be visually verified as vacant.
3. Public Housing: Do not inspect vacant units at public housing properties. However, all vacant units in the sample must be visually verified.
4. When applicable, inspectors are required to inspect vacant units that are still in the process of being repaired and all defects are recorded in accordance with guidance concerning "Work in Progress".
5. The 4.0 software automatically selects alternate buildings and/or units. If there are no alternate units available for selection, then the inspector must call the REAC TAC to secure a REAC TAC reference number before proceeding. The reference number, reason, and appropriate comment must be recorded in the inspection software.

# PROPERTY INSPECTABLE AREAS

## SITE

### A. SITE GENERAL INFORMATION

1. When recording a location for a Site deficiency in the 4.0 software associate it with the nearest building.
2. The inspector is required to input in the UPCS software the total square footage for Parking Lots/Driveways/Roads and Walkways/Steps. The inspector is to request the square footage information from the property representative. If it is unavailable, the inspector must use their judgment to make a professional estimate.
3. 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.
4. Parking Lots/Driveways/Roads and Walkways/Steps proportionality deficiencies must continue to be recorded after the minimum deficiency threshold is reached (10% for Parking Lots/Driveways/Roads and 5% for Walkways/Steps).
5. All roadways and walkways that the property represents as being owned by the property need to be inspected.
6. Roadways and walkways that the property represents as owned by a public authority such as the city, county, or state are not to be inspected. Exemption will be for H&S deficiencies that impacts/affects residents and should be recorded as SITE HAZARDS OTHER.
7. Inspecting Site:
  - a. Non-scattered properties: Regardless if the building is in the sample or not, the site must be inspected around every building.
  - b. Scattered site properties: After generating the sample and selecting the sample buildings and units, inspectors are only required to re-visit and inspect the sample buildings and units and the sites associated with the sample buildings. If any building is selected as part of the sample on a multiple building location, the entire site for that location must be inspected.

### B. FENCING AND GATES

1. A security/safety fence could be either an exterior or interior fence but its intended purpose is to provide safety and security for the property residents and must be at least four feet high. Security fences typically enclose the entire perimeter of the property. However, the safety fences do not fully enclose the property and prevent access to specific areas. Fences less than four feet high are considered non-security/non-safety fencing.
2. If a property has fencing along its perimeter acting as a security/safety fence (4' in height or more), whether it is owned by the property or not, the fencing must be inspected for deficiencies. This does not apply to non-security/non-safety perimeter fencing (less than 4' in height).
3. A privacy fence that is used for privacy of an individual unit is considered as non-security/non-safety fencing when **less than 4'** in height. The 25% requirement applies to each individual fence. However, the 25% requirement is applicable to the entire fence when it is connected to form a continuous single structure.
4. Any missing gate or gate with missing/defective hardware, including motorized operators, shall be recorded as Site/Fencing & Gates/Security" Fencing or gate is missing a section or uprooted".

### C. GROUNDS

1. The deficiency Overgrown Vegetation addresses conditions that have a potential or existing adverse effect on the physical condition of the property or negatively impacts the use of the property by

residents. Do not record a deficiency for vegetation that is intentionally grown on walls or fences and is maintained but does not adversely affect the structure or the intended use of that structure.

2. Vegetation growing on the roof or its components will be recorded as [Site], [Grounds], [Overgrown Vegetation]. I.E. vegetation growing in gutters, moss on shingles, etc.
3. Here are a couple examples of when overgrown vegetation contacting roofs and gutters shall be recorded.



In addition to tree limbs/bushes contacting the building and fencing, here are two more examples of when overgrown vegetation contacting fencing and buildings shall be recorded.



Below are examples of when vegetation is in contact with a fence and a walkway, but it is so insignificant that it should not be considered when determining the overgrown vegetation deficiency.







4. For [Site], [Grounds], [Erosion], to be recorded it must have displaced soil. Do not record bare ground as erosion. I.E. The area under a tree or path that residents use that does not have grass growing on it.

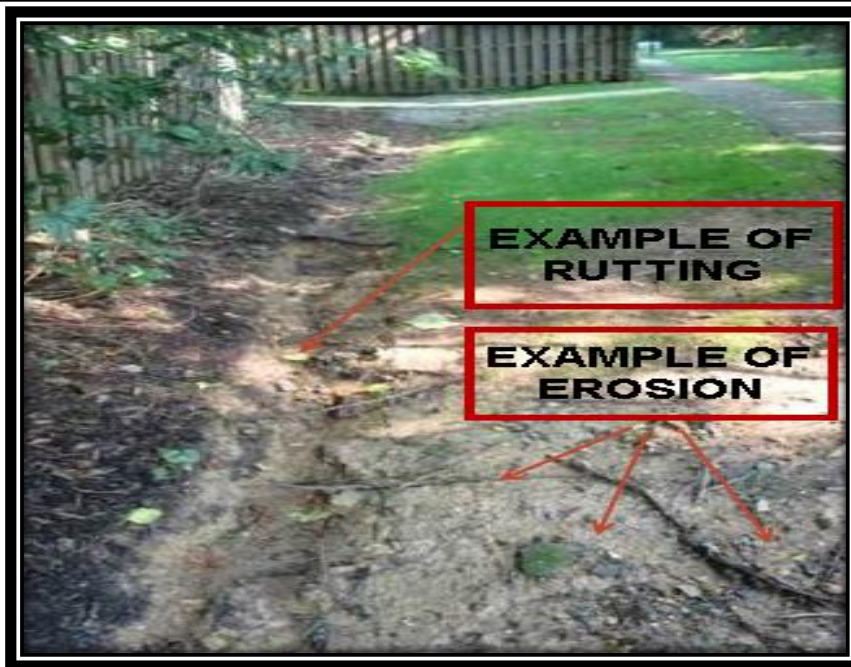
**Below are examples showing when the grounds are bare due to location under trees, but shows no signs of rutting or soil displacement. Unless the bare ground displays one of these issues is not erosion and shall not be recorded.**





Below are examples of when erosion shall be recorded.





#### D. MARKET APPEAL – GRAFFITI

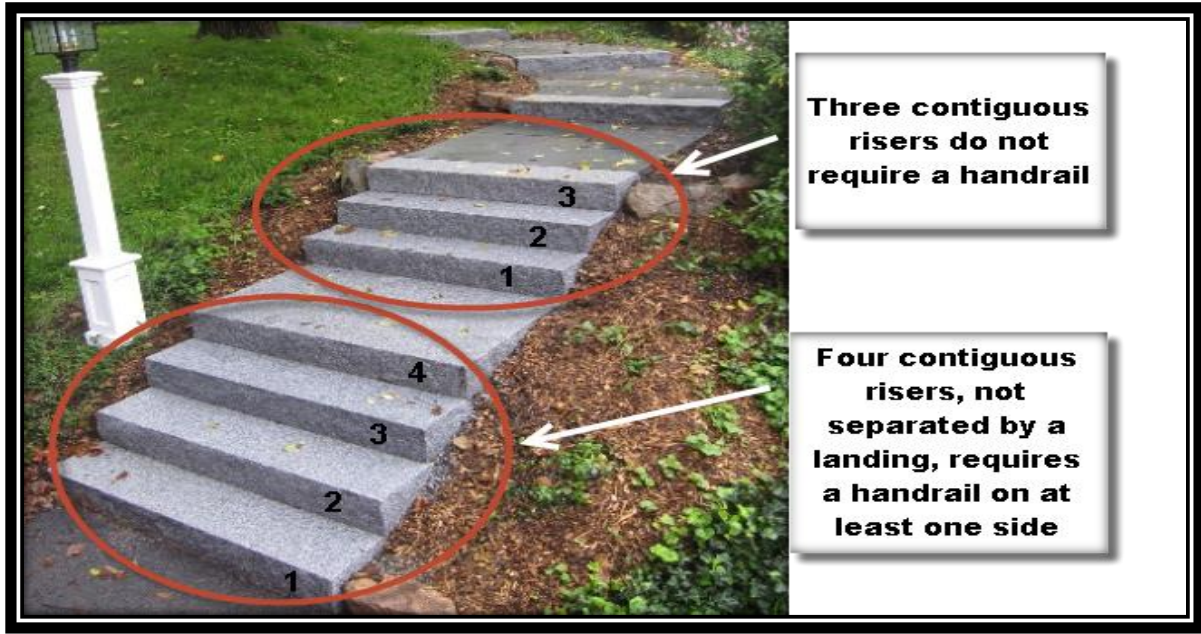
1. Regardless of the medium used (spray paint, chalk, etc.) to create crude inscriptions, gang signs, symbols, drawings, etc., It will be recorded as graffiti if observed from 30 feet away. **EXCEPTION:** No deficiency will be recorded by the inspector if he/she observes that sidewalk chalk has been used to create game boards such as hopscotch, etc. on flat ground surfaces like walkways and parking lots.

#### E. PLAY AREAS AND EQUIPMENT

1. Inspectors are to inspect park benches located within a play area and record deficiencies as [Site], [Play Areas and Equipment], [nearest associated building], [Play equipment (including benches) is broken, damaged, or inoperable] ... Benches not located within a play area are not inspected, other than Health and Safety issues as observed.

#### F. WALKWAY/STEPS

1. A handrail is required for four or more risers not separated by a landing.



2. In the past, any stairs or landings (not under roof) outside the face of the building were to be addressed as part of the site. If a defect was observed it would be recorded as a site – walkways/steps defect. The new protocol will be as follows: Any stairs/steps that are not under roof and are not directly connected to either the building or unit porch/landing will be associated with the site.



SEE EXAMPLE BELOW SHOWING COMMON AREA STAIRS ON EXTERIOR OF BUILDING.



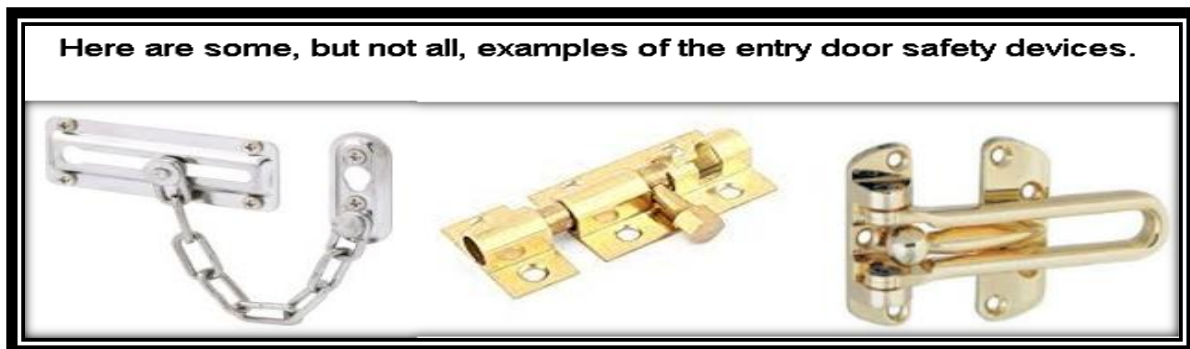
SEE EXAMPLE BELOW SHOWING STAIRS CONNECTED TO A SINGLE FAMILY HOME



## BUILDING EXTERIOR

### A. DOORS

1. Sample buildings may be generated that contain no sample units. Therefore, any door deficiencies may have to be recorded in different inspectable areas depending on whether the sample building has sample units to be inspected or not. Record as follows:
  - a. If a sample building has sample units, record all deficiencies observed on the unit entry doors in the associated units. Do not record deficiencies for unit entry doors on units not in the sample.
  - b. If a sample building has no sample units to inspect, record all deficiencies observed on any unit entry doors on the building exterior in [Building Exterior], [Doors]... and all deficiencies observed on any unit entry doors in a common area hall or corridor in [Common Areas], [Halls/Corridors/Stairs], [Doors]... In these cases, disregard the *Note* in the [Building Exterior], [Doors]... deficiency that says, *"This does not include unit doors."*
  - c. If common area doors exist, whether exterior or interior, any observed defects are to be recorded in the associated common area into which the door swings. The only exceptions are for doors that swing outward leading to the building exterior. In this case record any deficiencies identified in [Building Exterior], [Doors]...
2. There are two types of entry doors: (1) a building entry door that leads from the exterior of a building into the building interior, and (2) a unit entry door that leads from the exterior of a building or from a building common area into a unit. If an inspector observes a deficiency on the entry door of a single-family building, the deficiency must be recorded under [Unit], [Doors]. [Building Exterior], [Doors] would be marked as "NA".
  - a. A lock is not required on any door. If a lock was installed it must be inspected to ensure that it functions as designed with the exception that common area interior doors (not unit entry) may have missing locks. Inspectors must distinguish between locks that 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.
  - b. Entry doors are often installed with multiple locking and/or security devices such as: a privacy lock, a single cylinder deadbolt, and a slide/chain type security lock. Each will be inspected for correct operation if present during the inspection. Exception: The inspector, when inspecting the slide/chain type security devices, must use his/her judgment to determine if it was installed by the property or the resident. I.e. if most units have these type devices then it will be inspected and if found deficient it will be recorded, but if the inspector observes that only some of the units have these devices, the inspector will not record a defect.



3. The deficiency *Deteriorated/Missing Caulking Seals* applies only to entry doors. When recording seal defects, inspectors must use their own professional experience to observe and determine whether a factory applied or professionally installed seal is or was present. Inspectors are not to record a deficiency for missing or deteriorated after-market seals applied by the residents.
  - a. Entry doors not designed with seals are not required by the UPCS protocol to have seals and shall not be recorded as a deficiency.
  - b. When the inspector observes light around a closed entry door with a seal that exhibits no evidence of seal damage, it is a deficiency that is to be recorded as [Light can be observed around the edges and you observe no seal deterioration] in the appropriate inspectable area.
  - c. Insulated glass and thermal pane doors that show evidence of seal leakage, such as condensation or discoloration between glass panes, must be recorded as [Seals/caulking is missing or deteriorated to the point the door is not weather-resistant (if designed to have seals)] in the appropriate inspectable area.
4. Screen, storm, and security doors are defined as follows and will be inspected as part of the associated Common Area or Unit:
  - a. A screen door has a screen with or without a locking device.
  - b. A storm door may have a glass panel but is designed to provide protection to the entry door.
  - c. A security door is designed to provide added security through strength and has additional locks and/or other locking mechanisms.
5. Holes left in doors from the removal of hardware must be evaluated as door surface damage.



6. A door missing from its jamb or frame is recorded as [Door is missing] regardless of whether the door is in the immediate area or not.

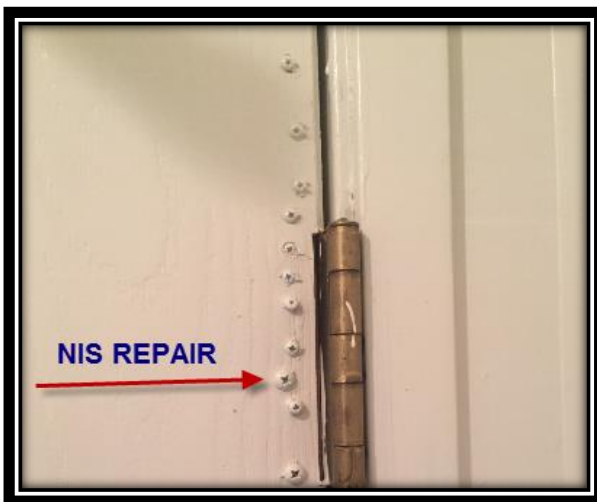


7. Double doors that serve as one door entrance are one door. Record as only one missing door regardless if one or both are missing.





8. If most doors within an area are painted or varnished, then any unpainted or unvarnished door must be recorded as a [Exterior, Common Area or Unit], [Doors], [appropriate floor level or room location], [type of door], [Surface is damaged], [Door has significant peeling, cracked, or no paint] deficiency. If most the doors are unpainted or unvarnished, do not record a deficiency.
9. A stick is no longer an acceptable alternative to an inoperable lock for a sliding glass door. A stick may be used as a secondary lock but cannot be used as a primary means of securing the door.
10. Two attempts shall be made varying the angle of the open door (e.g. 45°, 90°, etc.). If after two attempts the door does not latch it is a defect under the appropriate inspectable area.
11. Do not allow a resident or POA to open a window to allow a door to shut. The door should work when the windows are in an open or closed position.
12. Delaminated wood or metal door surfaces that are screwed together are not an acceptable repair and a deficiency shall be recorded under the inspectable area with an appropriate NIS Repair comment.



13. A missing strike/latch plate from the door frame shall be recorded as missing hardware under the appropriate inspectable area.

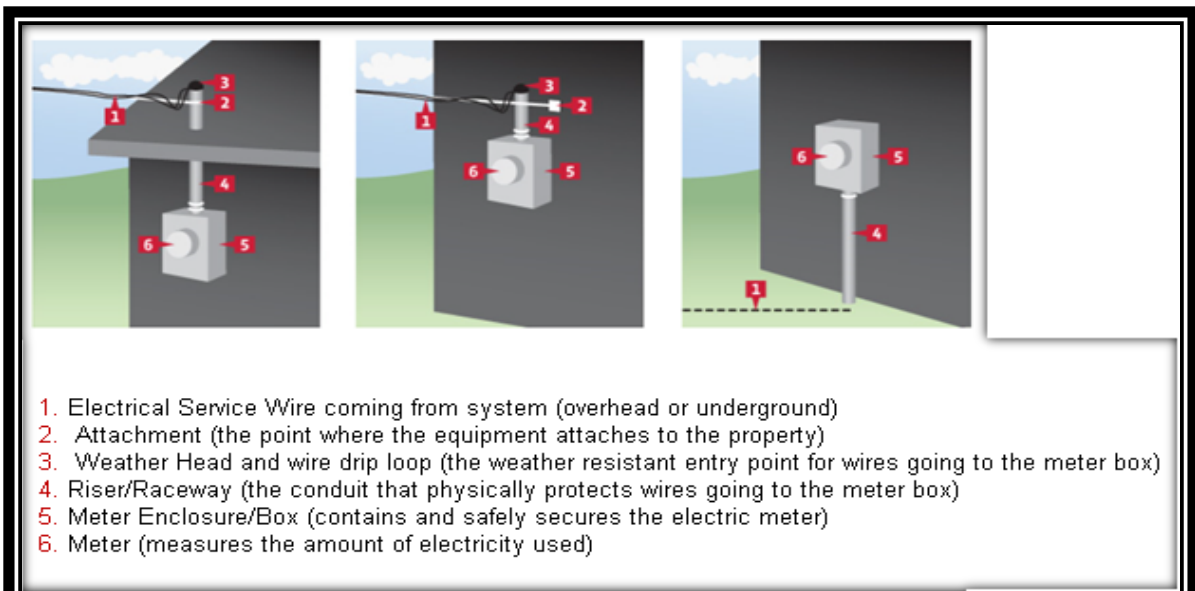


14. Group Homes are special use facilities, not unlike nursing homes, and the rule applicable to 504 units must be applied. If management chooses not to allow the clients to have locks on the doors, then the UPCS inspection protocol does not require them.

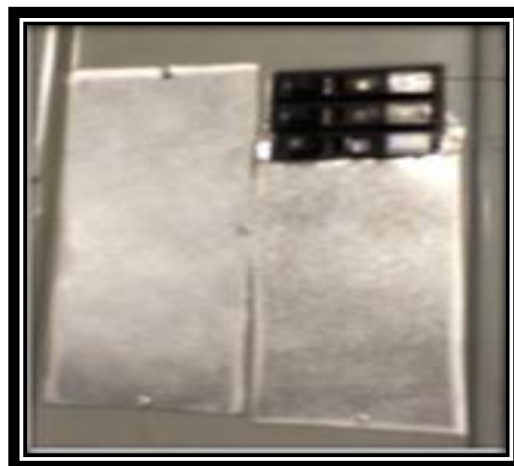
## B. ELECTRICAL

The inspector must 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 service a specific area of the building (e.g. community room, hallway, unit) must be recorded in their respective locations.

1. The inspector will not record a deficiency for missing covers or exposed bare wiring for low voltage (telephone lines, security Systems, etc.) or cable television wiring.
2. For the purposes of inspecting the property, all electrical components used to supply or control the supply of electricity to the building after the meter base are considered to belong to the property.



3. Do not inspect non-property owned utility boxes which include the meter base and supply service. Any observed Health and Safety defects are to be recorded, even if the utility box is non-property owned. Record them under [Health and Safety], [floor level (if applicable)], [Hazards], [Any Other - This does pose a risk of bodily injury] for that building or under [Site], [Health and Safety], [building or nearest building], [Hazards], [Any Other - This does pose a risk of bodily injury], as appropriate. If the Health and Safety defect is Life Threatening, it will not automatically appear on the EH&S report and will need to be manually tracked and recorded on the Notification of Exigent and Fire Safety Hazards Observed form at the end of that day's inspection.
4. Any electrical panel/box that is designed to have an interior cover but the cover is missing, exposing bare wires/connections at the time of inspection, will be recorded as [Missing Covers, exposing electrical connections] in the appropriate Inspectable area.
5. Electrical panels (breaker/fuse boxes) that are secured at the time of inspection (except for disconnects and timer boxes) must be made accessible to the inspector for inspection. Any electrical panel (breaker/fuse box) that is not made accessible will be recorded as [Blocked access to electrical panel] in the appropriate Inspectable area.
6. Electrical Panels: The introduction of any foreign materials within the panel to cover or fill a crack or opening is prohibited and (e.g. caulking, spray foam, screws, etc.), is not an acceptable repair (NIS). It shall be recorded in the appropriate inspectable area as an "H&S – Electrical Hazard" under "Opening in the electrical panel are not properly covered". The only acceptable materials allowed in these type devices are those that are specifically designed, tested, and approved for this application. Below are examples of unacceptable repairs:



- a. Timer and disconnects (all electrical boxes other than breaker/fuse) that are not secured must be inspected, if doing so will not interrupt electrical service. Secured means that it requires the use of a tool. Tools can be items such as keys for locks, cutters, screwdrivers, or other similar instruments.
- b. If an exterior disconnect or timer box that is not associated with any other specific inspectable area has no cover resulting in exposed bare wires or connections, the inspector is to record this as a deficiency at [Building Exterior], [Health and Safety], [Electrical Hazards], [Exposed bare wires], regardless of the design of the box. If the disconnect is associated with a specific sample unit, common area or system, the deficiency would be recorded in that area.
- c. An opening or gap when measured and found to be **greater than a 1/4 inch between the breakers/fuses and the internal cover of an electrical panel** is an electrical hazard. This deficiency is to be recorded under the applicable inspectable area as [Site, Building Exterior, Building Systems, Common Areas or Unit], [Health and Safety], [appropriate building, floor level or room location (if applicable)], [Electrical Hazards], [Openings in electrical panels], [The openings in the electrical panels are not properly covered].
- d. All surface mounted electrical devices must be inspected for any missing knockout(s). If missing, a deficiency will be recorded in [H&S], [Electrical Hazard], [Opening in electrical]



- e. Exposed bare wires are defined as: Non-insulated, high voltage (110V/220V or higher) conductors, connectors, and terminals. Fully insulated conductors in an open junction box/pass through are not a defect. If exposed bare wire, un-insulated connectors, capped, or open terminal connections are visible in an open junction box/pass through the inspector will select the Decision: “The exposed bare wires ARE capped BUT NOT enclosed in a secured electrical box OR ARE NOT capped” resulting in an Exigent Health & Safety defect under [Health and Safety], [Electrical Hazards], [Exposed bare wires].
- f. **Inspection of Zip Ties:** If the inspector sees a reason why they should be tested (e.g. sun baked, color is worn and faded, etc.) and when tested it breaks off in their hands and exposes bare electrical wiring or connections to be exposed, it is a defect. Otherwise, if the zip tie breaks when tested, but no bare wiring or connections are exposed, it is not a defect. This does not

imply that every zip tie on every property must be tested. Professional common sense must be applied for this situation on a case-by-case basis.

#### C. FHEO - 32" WIDE MAIN ENTRANCE

1. This inspectable item applies to all occupied building types.

#### D. FHEO - ACCESSIBILITY TO MAIN FLOOR ENTRANCE

1. All FHEO are intended to provide handicap access for individuals with disabilities (i.e. wheel chairs, walkers, etc.).
2. 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. Main floor entrance pertains only to those entrances accessed during the inspection. This means that only the doors into common areas and units selected for inspection are to be considered when evaluating the building for [Exterior], [Accessibility to Main Floor Entrance] ...
3. Accessible routes include a level surface to the door, ramps where necessary, and sufficient width of 36 inches.

#### E. FIRE ESCAPES/FIRE EXITS

1. If the fire escape is clearly blocked or not accessible from any floor level of the building a deficiency for [Building Exterior], [Fire Escapes] ... exists and must be recorded.

#### F. FOUNDATIONS

1. The deficiency [Building Exterior], [Foundations], [Cracks or Gap...] is applicable to both foundation walls and floors/structure slabs.
2. For [Building Exterior], [Foundation], [Spalling]... deficiencies, the inspector is to record spalling (no exposed rebar) relative only to the percentage of the foundation area observed. The percentage is to be calculated based on each foundation wall of the building.
3. Foundation vent openings are not an inspectable item and will not be recorded.

#### G. EXTERIOR OUTLETS

1. Ground Fault Interrupter (GFI): Inoperable GFI outlets located on the building exterior are not a deficiency in the UPCS inspection software but will be recorded as a [Building Exterior], [Health and Safety], [Hazards], [Any Other - This does pose a risk of bodily injury] when observed unless that GFI can be associated with a **specific inspectable area**.
2. When a deficient outlet is identified with a **specific inspectable area**, then any deficiency found is to be cited in that **specific area**.
3. All exterior **non-sample unit** outlets shall be inspected, but will not be tested. If found deficient it will be recorded as a [Building Exterior], [Health and Safety], [Hazards], [Any Other - This does pose a risk of bodily injury].
4. Ground Fault Interrupter (GFI) - Inoperable is an automatic non-life threatening Health and Safety deficiency when recorded. Disregard the comment in the definition that says, "If this condition is a health and safety concern, you must record it as 'Health and Safety: Electrical Hazards.'"
5. Any burnt electrical outlet shall be recorded under the appropriate inspectable area as [Health and Safety], [Hazards], [Any Other - This does pose a risk of bodily injury]. See an example of a burnt electrical outlet below.



## H. LIGHTING

1. An inspector must inspect all broken or missing lighting fixtures or bulbs on the building's exterior and record deficiencies in [Building Exterior], [Lighting]... Site lighting, not attached to a building, must be assigned to the nearest building and evaluated as a part of that building's exterior lighting. An exception is a deficiency found in exterior lighting that is controlled (switched) from within individual units which must be recorded in [Unit], [Lighting]... of the associated unit if it is part of the sample.

## I. ROOFS

1. All flat 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.

## J. WALLS

Inspector Note – Often, when properties are making or have made walls repairs, such as tuck-pointing, siding replacement/repair, painting, etc., the new materials will not be an exact match to the original material colors. The inspector must use their best judgement and professional common sense when determining whether to record this or not.

1. Holes in a building wall that serve an intended use are not to 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 [Building Exterior], [Walls], [Hole(s)] ...
2. The defect for a staining on a wall is only applied to "intended painted surfaces". Such as: wood siding – not vinyl, aluminum, or brick.
3. Minor chipping of the brick wall corners will no longer be recorded as a deficiency.



4. If any wall exhaust vent penetration has missing slates or openings in the cover plate; it is considered as a level 3 hole in the wall.



5. Tuck pointing is the appropriate repair for mortar joints. The REAC guidance also allows for the use of products designed for the specific use of filling those small cracks in bricks and other concrete materials. It is not acceptable to use a latex or silicone caulking to fill small cracks on masonry veneers. When inspecting, this type repair the inspector shall be aware that the new repair will not match the older parts of the building. This is acceptable – no defect if done in workmanlike manner and the repair was made using appropriate materials.



## K. WINDOWS

1. Sample buildings may be generated that contain no sample units. Therefore, window deficiencies may have to be recorded in different inspectable areas depending on whether the sample building has sample units to be inspected or not. They are to be recorded as follows:
  - a. If a sample building has sample units and common areas, record window deficiencies in the units and common areas in which they are observed. Health and Safety window deficiencies that

are observed on non-sample units should be recorded under [Exterior or Common Area], [appropriate floor level (if applicable)], [Health and Safety], [Hazards], [Any Other - This does pose a risk of bodily injury].

- b. If a sample building has no sample units to inspect, all unit windows must be visually inspected and deficiencies observed recorded in [Building Exterior], [Windows].... Inspectors must record all window deficiencies observed in common areas in the associated Common Area.
2. Insulated glass and thermal pane windows that show evidence of seal leakage such as condensation or discoloration between glass panes must be recorded as [Caulk, Seals, or Glazing Compound (includes Thermopane or insulated windows)], [Deteriorated or Missing], [There is condensation or discoloration between the glass panes of a Thermopane] in the appropriate inspectable area.



3. When fixed security bars are present that cover a window that is the only secondary means of emergency egress from a floor area (e.g. room, unit, building) on the third or lower floor, or on any floor that the window is the designed egress point to a designated fire escape, the deficiency [Windows], [appropriate floor level or room location], [Security Bars], [Window is designed for egress, but exiting is severely limited or impossible], [Security bars are damaged or improperly constructed/installed] must be recorded in the appropriate inspectable area. However, a deficiency must not be recorded for windows that are not large enough or not otherwise designed for egress.
4. A hasp attached to moveable security bars is not a deficiency if 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 [Windows], [appropriate floor level or room location], [Security Bars], [Windows is designed for egress, but exiting is severely limited or impossible], [Security bars that are designed to open cannot be readily opened or require a key or other special tool] deficiency in the appropriate Inspectable area, when the window is the only secondary means of emergency egress from a floor area on the third or lower floor.
5. Child safety window guards that are normally found in apartment and public hallway windows to protect children 10 years of age or younger from falling to the outside of the building, are typically lightweight metal construction and can be dislodged with a reasonable degree of force when necessary and should not be considered as blocked egress **unless** they are improperly installed or constructed.
6. Caulking used to cover a crack in a window is not allowable/acceptable repair and shall be recorded under the correct inspectable area with an appropriate NIS Repair comment.



7. Operable windows with their locking mechanisms at 8' or higher from the floor/landing are no longer required to be inspected for correct operation, but a visual inspection must be conducted by the inspector for broken/cracked glass, seal damage, etc.



## BUILDING SYSTEMS

### A. BUILDING SYSTEMS GENERAL INFORMATION

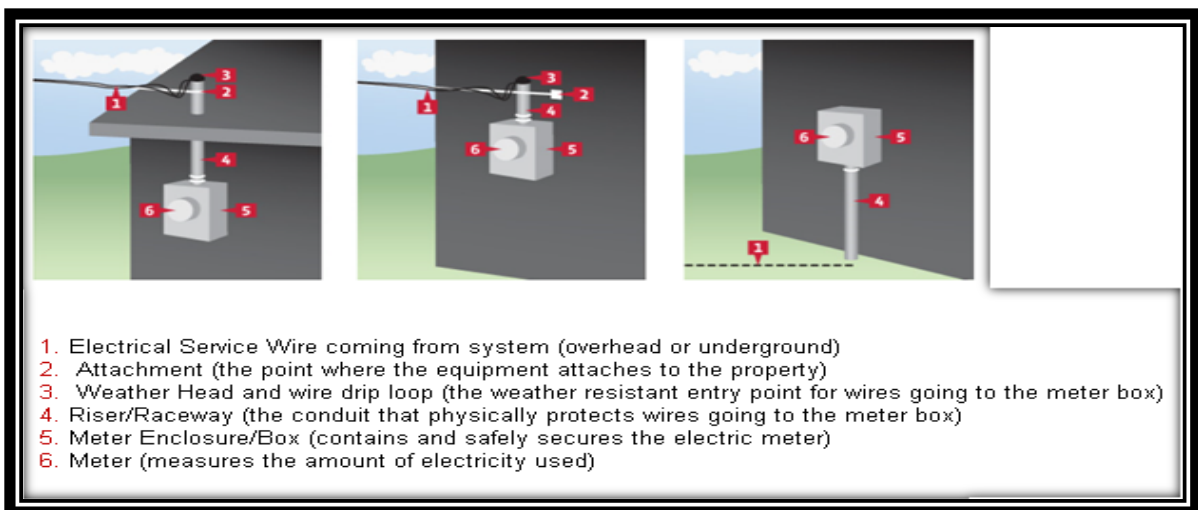
1. Sample buildings may be generated that contain no sample units. In the case when a Building System inspectable item(s) such as HVAC or Fire Protection is located inside a unit and is not visible to the inspector, the protocol requires the inspector to record "NOD" for the item and make a comment in the Building Comments field identifying that the item could not be inspected because it was in a unit that was not in the sample.

### B. DOMESTIC WATER

1. The end of the pressure relief valve or its extension on a hot water heating system must be no more than 18 inches from the floor or piped to a designed system, otherwise it must be recorded as a deficiency.
2. A pressure relief valve piping that is crimped or otherwise restricted shall be recorded as [Building Systems], [Health and Safety], [Hazards], [Any Other - This does pose a risk of bodily injury].
3. A water tank located in a single common area is to be evaluated under [Systems], [Domestic Water].
4. A leaking hose bib that services a single common area or multiple units is to be evaluated under [Systems], [Domestic Water]. When the hose bib services a single unit evaluate it as [Unit], [Water Heater].
5. Inspection of the gas water heater vent piping. The piping shall be inspected to ensure that it has no gaps in the piping (sometimes hidden by tape) and the piping size runs from either one continuous size or runs from smaller to larger beginning with the smaller piping at the water heater.

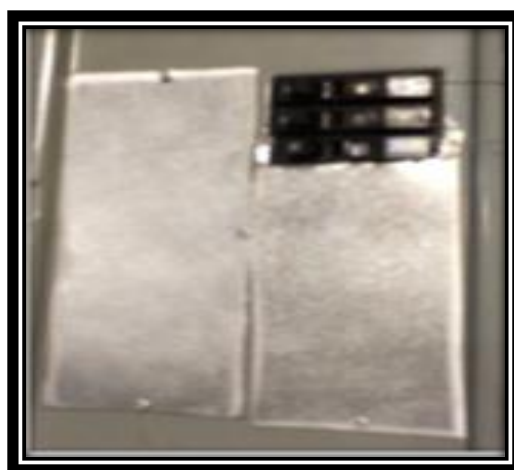
### C. ELECTRICAL SYSTEM

1. The inspector must 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 service a specific area of the building (e.g. community room, hallway, unit) must be recorded in their respective locations.
2. The inspector will not record a deficiency for missing covers or exposed bare wiring for low voltage (telephone lines, security Systems, etc.) or cable television wiring.
3. For the purposes of inspecting the property, all electrical components used to supply or control the supply of electricity to the building after the meter base are considered to belong to the property.

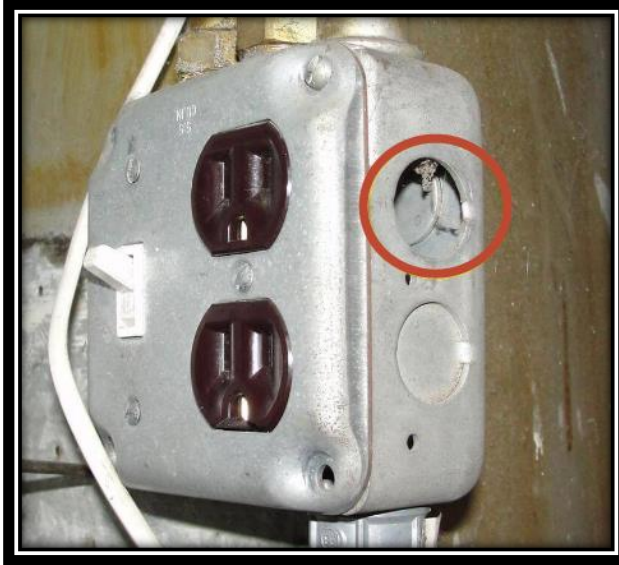




4. Do not inspect non-property owned utility boxes which include the meter base and supply service. Any observed Health and Safety defects are to be recorded, even if the utility box is non-property owned. Record them under [Health and Safety], [floor level (if applicable)], [Hazards], [Any Other - This does pose a risk of bodily injury] for that building or under [Site], [Health and Safety], [building or nearest building], [Hazards], [Any Other - This does pose a risk of bodily injury], as appropriate. If the Health and Safety defect is Life Threatening, it will not automatically appear on the EH&S report and will need to be manually tracked and recorded on the Notification of Exigent and Fire Safety Hazards Observed form at the end of that day's inspection.
5. Any electrical panel/box that is designed to have an interior cover but the cover is missing, exposing bare wires/connections at the time of inspection, will be recorded as [Missing Covers, exposing electrical connections] in the appropriate Inspectable area.
6. Electrical panels (breaker/fuse boxes) that are secured at the time of inspection (except for disconnects and timer boxes) must be made accessible to the inspector for inspection. Any electrical panel (breaker/fuse box) that is not made accessible will be recorded as [Blocked access to electrical panel] in the appropriate Inspectable area.
7. ***Electrical Panels:*** The introduction of any foreign materials within the panel to cover or fill a crack or opening is prohibited and (e.g. caulking, spray foam, screws, etc.), is not an acceptable repair (NIS). It shall be recorded in the appropriate inspectable area as an "H&S – Electrical Hazard" under "Opening in the electrical panel are not properly covered". The only acceptable materials allowed in these type devices are those that are specifically designed, tested, and approved for this application. Below are examples of unacceptable repairs:



- a. Timer and disconnects (all electrical boxes other than breaker/fuse) that are not secured must be inspected, provided that doing so will not interrupt electrical service. Secured means that it requires the use of a tool. Tools can be items such as keys for locks, cutters, screwdrivers, or other similar instruments.
- b. If an exterior disconnect or timer box that is not associated with any other specific inspectable area has no cover resulting in exposed bare wires or connections, the inspector is to record this as a deficiency at [Building Exterior], [Health and Safety], [Electrical Hazards], [Exposed bare wires], regardless of the design of the box. If the disconnect is associated with a specific sample unit, common area or system, the deficiency would be recorded in that area.
- c. An opening or gap must be measured to be **greater than a  $\frac{1}{4}$  inch between the breakers/fuses and the internal cover of an electrical panel** is an electrical hazard. This deficiency is to be recorded under the applicable inspectable area as [Site, Building Exterior, Building Systems, Common Areas or Unit], [Health and Safety], [appropriate building, floor level or room location (if applicable)], [Electrical Hazards], [Openings in electrical panels], [The openings in the electrical panels are not properly covered].
- d. All surface mounted electrical devices must be inspected for any missing knockout(s). If missing, a deficiency will be recorded in [H&S], [Electrical Hazard], [Opening in electrical]



- e. Exposed bare wires are defined as: Non-insulated, high voltage (110V/220V or higher) conductors, connectors, and terminals. Fully insulated conductors in an open junction box/pass through are not a defect. If exposed bare wire, un-insulated connectors, capped, or open terminal connections are visible in an open junction box/pass through the inspector will select the Decision: “The exposed bare wires ARE capped BUT NOT enclosed in a secured electrical box OR ARE NOT capped” resulting in an Exigent Health & Safety defect under [Health and Safety], [Electrical Hazards], [Exposed bare wires].
  - f. A missing elevator control panel cover must be recorded as [Systems], [Electrical System], [appropriate floor level], [Missing cover, exposing electrical connections], [The electrical connections/wires are NOT abandoned and capped] if the control panel was designed to have a cover. If a cover was not part of the original design do not record a [Missing cover, exposing electrical connections] deficiency. However, if the condition results in a life-threatening situation, it will need to be recorded under [Systems], [Health and Safety], [appropriate floor level], [Electrical Hazards], [Exposed bare wires], [The exposed bare wires ARE capped BUT NOT enclosed in a secured electrical box OR ARE NOT capped].
  - g. **Ground Fault Interrupter (GFI) - Inoperable** is an automatic non-life threatening Health and Safety deficiency when recorded. Disregard the comment in the definition that says, “If this condition is a health and safety concern, you must record it as ‘Health and Safety: Electrical Hazards.’”
8. **Inspection of Zip Ties:** If the inspector sees a reason why they should be tested (e.g. sun baked, color is worn and faded, etc.) and when tested it breaks off in their hands and exposes bare electrical wiring or connections to be exposed, it is a defect. Otherwise, if the zip tie breaks when tested, but no bare wiring or connections are exposed, it is not a defect. This does not imply that every zip tie on every property must be tested. Professional common sense must be applied for this situation on a case-by-case basis.
9. **Tripped Breaker:** The POA can reset a tripped breaker if the breaker does not affect a life safety item such as call-for-aid or a smoke detector and there will be no deficiency observed. Note: The inspector should never turn on any breaker that is found to be in the “off” position, since he/she is not sure what appliance or dangerous condition that it might create (e.g. turns on stove). The POA

should be given the option to turn on any breakers that are off. The exception to this is the testing of the GFCI and AFCI protected breakers.

#### D. ELEVATORS

1. Elevator Inspection Policy: This requirement is to be determined during the initial interview process at the beginning of the inspection.
  - a. Inspectors are not to enter an elevator machinery room when the POA states that there is no non-elevator equipment in the room. However, the inspector is required to inspect the door. If the door to the room is not secured, record this condition under [Common Area], [Health and Safety], [Hazards], [Any Other - This does pose a risk of bodily injury] as “Door to the elevator room was not locked,” **but do not enter the room**. Other observed deficiencies with the door are to be recorded in the appropriate inspectable area.
  - b. When the elevator machinery room contains non-elevator equipment, or is the only route to another area requiring inspection, the room is to be inspected. The property must provide one or more of the following conditions:
  - c. Elevator equipment must be:
    - 1) Located on a suitable balcony, gallery, or platform that excludes unqualified persons or is at least eight (8) feet above the floor.
    - 2) Protected by permanent, substantial partitions or fencing or screens such that access is limited to qualified personnel only.
    - 3) The property must provide a qualified person to grant access to the room when the room is deemed inspectable.
    - 4) The property must provide a written waiver/variance from the governing authority that permits access without a qualified person.
    - 5) A qualified person means someone who has the skills and knowledge related to the construction and operation of elevator equipment and installation and has received safety training in the hazards involved. It is under the guidance and supervision of the qualified person that the UPCS inspector will enter the room and conduct the inspection or pass through the elevator equipment room.
    - 6) The property is to confirm the qualifications of the escort.
    - 7) Governing authority is that which controls the inspection/certification of elevators for that location.
    - 8) If these rooms cannot be accessed as specified when the inspector arrives on-site to inspect, the inspector is to immediately notify REAC TAC that the inspection is unsuccessful because property did not meet required conditions, obtain a REAC TAC number, end the inspection, and report the inspection as unsuccessful (RUU) in Scheduler.
    - 9) All other aspects of operation, certificates, and Health and Safety deficiencies relevant to the elevators are to be reviewed or inspected per UPCS protocol.
2. CONVEYANCE SYSTEMS: By the UPCS protocol, any conveyance system such as a chair lift or stair lift is considered an elevator. In instances where these conveyance systems are not inspected by a third party, the POA shall demonstrate to the inspector, that the lift performs each function as designed by the manufacturer. If it is found to be defective, it shall be recorded as an inoperable elevator (Level 3).

## E. FIRE PROTECTION

### 1. Fire Sprinkler Heads:

- a. If paint or any other obstruction is observed on the sprinkler head a deficiency will be recorded. Paint on an escutcheon plate should not be recorded as a deficiency.
- b. If the escutcheon plate or any other components are missing or damaged, it will be recorded as a deficiency.
  - 1) The sprinkler and escutcheon are entirely intact, but the hole in the ceiling through which the sprinkler protrudes is larger than the escutcheon can cover. It will be recorded as a hole in the ceiling/wall if it meets the requirements.
  - 2) If the escutcheon has fallen and/or obstructs the water spray pattern it will be recorded as a level 3 missing component/blocked sprinkler head.
- c. If a leak is observed anywhere on the fire suppression system record the deficiency as [Building Systems], [Domestic Water], [appropriate floor level], [Water is leaking from any water systems component (not including fixtures)], [Component is leaking and was never designed to do so]. If the water is leaking near an electrical apparatus select [This condition May Result in a Health and Safety concern] on the last portion of the decision tree, if not select [This condition DOES NOT RESULT in a Health and safety concern].

### 2. Fire Extinguishers:

- a. Fire extinguishers supplied by the property that are missing, expired, discharged, or otherwise damaged will be cited as a deficiency regardless if it is or is not required by local code. Defective or expired extinguishers that are clearly owned by the resident must be recorded as [Unit], [Health and Safety], [appropriate room location], [Hazards], [Any Other - This does pose a risk of bodily injury].
- b. Buildings must meet the requirements of local and state fire and safety codes. Thus, some buildings have fire extinguishers, while others do not. If fire extinguishers are not present and there is no evidence, such as mounting brackets or fire cabinets, they are supposed to be present, it is not a deficiency.
- c. For determining the proportionality of *Missing/Damaged Expired Extinguishers*, the total number of extinguishers for a building will be calculated by counting all common area and building exterior extinguishers plus the extinguishers located in the sample units. Inspectors must track the number of fire extinguishers located in each building to determine the level of deficiency.

Two examples: (Assume all units in the examples have extinguishers.)

- 1) A 10 unit, row/townhouse with three units selected in the sample. If two out of the three sample units have expired extinguishers then for determining the proportionality for [Systems], [Fire Protection], [appropriate floor level], [Fire extinguishers or fire hoses are missing, damaged, or expired] ..., two of the three total or 66% of the extinguishers are deficient and it is a Level 3 deficiency.
- 2) An 80 unit, mid/high rise building has ten common area extinguishers and 20 sample units. One mechanical room and two sample units have expired extinguishers, therefore three out of the 30 inspectable extinguishers, or 10% are expired. A Level 2 deficiency would be recorded under [Systems], [Fire Protection], [appropriate floor level], [Fire extinguishers or fire hoses are missing, damaged, or expired] ...

- d. If a missing tag is observed during the inspection and the property representative can provide documentation showing that the fire extinguisher has been inspected and/or serviced, within the last twelve (12) months, by an authorized entity such as a local Fire Department, Fire Marshall or any other entity that has received authorization from the local Fire Department to conduct fire extinguisher inspections; do not record a deficiency. If the property representative cannot provide evidence of such annual inspection, record the missing tag as a deficiency per the protocol.
- e. Inspectors should not evaluate extinguishers which are not obviously positioned for active service. This includes extinguishers that are being stored in a specifically designated area with the intention of being disposed of or serviced later (typically found in maintenance areas in various quantities).
- f. Applicability of the definition for Missing/Damaged/Expired Extinguishers:
  - 1) Level 1: Applies to an individual building with only fire extinguishers and no other fire control system. Record a deficiency if 5% or fewer of the extinguishers are missing, damaged, or expired.
  - 2) Level 2: Applies to an individual building regardless of the number of fire control systems. Record a deficiency if more than 5% but not more than 10% of the extinguishers are missing, damaged, or expired.
  - 3) 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.

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  - 4) Level 3: Applies to an individual building regardless of the number of fire control systems when extinguishers are installed in Common Areas on each floor. These are 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. This applies only if there is evidence that the floor used to have one.
- g. Inspectors must visually check the gauge and certificate attached only on re-chargeable fire extinguishers. For properties using disposable (or non-rechargeable) fire extinguishers, the inspector must visually check the gauge, which must clearly indicate the fire extinguisher is adequately charged (for example, the arrow in the fire extinguisher gauge is pointing within the green area, indicating it is not either under or over charged).

3. Fire Hoses:

- 1. If all fire hoses and hanger hardware have been removed from within a hose cabinet a deficiency should not be recorded. It is permitted for the fire hose cabinets to be left in place.
- 2. If the fire hoses have been removed and the hanger device is still in place, the missing fire hoses will be counted by substituting the fire hoses for the fire extinguishers within the deficiency for Fire Protection. It shall be recorded as follows: [Systems], [Fire Protection], [appropriate floor level], [Fire extinguishers or fire hoses are missing, damaged, or expired].
- 3. The UPCS protocol does not require fire hoses to have inspection tags. Do not record a deficiency for fire hoses with expired or missing tags.



## F. HVAC

1. HVAC in Building Systems is only “NA” when all the HVAC systems within a building are in the unit and are not being used to service common areas.
2. Inspection of the HVAC flue vent piping. The piping shall be inspected to ensure that it has no gaps in the piping (sometimes hidden by tape) and the piping size runs from either one continuous size or runs from smaller to larger beginning with the smaller piping at the HVAC unit.

## G. SANITARY SYSTEMS

1. A missing floor drain cover in a bathroom shall be recorded as a level 3 deficiency.
2. Any damaged drain, manhole or cleanout covers shall be recorded as a level 3 deficiency under “the protective cover is missing”.

## COMMON AREAS

### A. COMMON AREAS GENERAL INFORMATION

1. The property representative must provide access to all building common areas. Inspectors are not required to move items to gain access to an inspectable area. For the purposes of the REAC inspection all areas that are not residential units are considered common areas and must be inspected. Exceptions are:
  - a. Areas of a building that have been blocked off by the POA for any reason should be made accessible to the inspector such as rooms where the door has been covered with sheets of plywood using drywall screws. If the inspector is not provided access then the inspector must: 1) secure a REAC TAC reference number and 2) make an appropriate note in the Building Comments field located on the Building screen such as, “Doors covered with plywood. POA considers this area sealed off and has denied access.” Under certain circumstances properties are permitted to take sections of a building off-line.
  - b. For any areas of the building that the POA is not authorized to enter, such as a mail room in a high rise building or a cell phone equipment room, the inspector must provide a clear description of the room that could not be accessed in the Building Comments field located on the Building screen along with a comment, such as “POA states they are not authorized to enter mail room located in lobby.”
2. The property representative must provide the inspector with access to physically inspect for correct operation all inspectable items, such as doors, windows, and light switches. If the inspector is not provided access to inspectable items, the inspector is to record these items as defective.
3. Medical-related equipment found in nursing and group homes is not included in the UPCS software and must not be inspected.
4. It is not a UPCS inspection requirement for the property to provide smoke detectors in Common Areas. However, if there is a smoke detector in a Common Area it must be tested and it must function.

5. REAC protocol does not require the inspection of any inspectable items located in an attic or crawl space area, regardless if there is a fixed means to access it such as an access door to the crawl space or a disappearing attic ladder.

**Inspector note:** Often, when properties are making or have made repairs to walls, floors, ceilings, etc., the new materials will not be an exact match to the original material colors. The inspector must use their best judgement and professional common sense when determining whether this is an acceptable repair or not.

## B. BASEMENT/GARAGE/CARPORT

1. Record Common Area garage and carport deficiencies in Common Areas only when the Basement/Garage/Carport is attached to or within the confines of the building.
2. Cracks on basement floors **or slab on grade** are to be recorded under [Building Exterior], [Foundations], [Cracks or Gap...].

## C. CEILING

1. Hole, paint, and water stains/water damage/mold/mildew defects are cumulative when they appear on any one ceiling surface (per room).
2. Smoke, grease or dirt on ceiling surfaces that can be washed off is not considered deteriorated paint.
3. When a repair is done to a textured ceiling (popcorn/stippled) it is very difficult to make the repair blend seamlessly into the surrounding ceiling. The UPCS protocol allows for any single floor area (room) to have a cumulative total of less than four square feet of this type of ceiling repair. If the repair exceeds four square feet in any single floor area it will be recorded as an NIS repair in the appropriate area.



4. **Drywall Repair:** Sheetrock, tape and mud are the correct materials to repair holes in sheetrock. Simply covering a hole or damaged drywall with plywood/laminate is not correct.
  - a. The exception to this rule regarding sheet rock repair is for intentional holes in the sheetrock to allow for access to plumbing, electrical, telephone, etc.
  - b. These access points shall be covered, secured and may use alternate materials other than sheetrock to cover the access point.

- c. The inspector will require that a sampling of these access points covers be removed to verify the purpose of cover.
- d. The inspector will write up any access point for needing paint if the color does not match the wall color in the area under “needs paint” with the appropriate NIS comment.

#### D. DOORS

1. Sample buildings may be generated that contain no sample units. Therefore, any door deficiencies may have to be recorded in different inspectable areas depending on whether the sample building has sample units to be inspected or not. Record as follows:
  - a. If a sample building has sample units, record all deficiencies observed on the unit entry doors in the associated units. Do not record deficiencies for unit entry doors on units not in the sample.
  - b. If a sample building has no sample units to inspect, record all deficiencies observed on any unit entry doors on the building exterior in [Building Exterior], [Doors]..., and all deficiencies observed on any unit entry doors in a common area hall or corridor in [Common Areas], [Halls/Corridors/Stairs], [Doors]... In these cases, disregard the *Note* in the [Building Exterior], [Doors]... deficiency that says, “*This does not include unit doors.*”
  - c. If common area doors exist, whether exterior or interior, any observed defects are to be recorded in the associated common area into which the door swings. The only exceptions are for doors that swing outward leading to the building exterior. In this case record any deficiencies identified in [Building Exterior], [Doors]...
2. There are two types of entry doors: (1) a building entry door that leads from the exterior of a building into the building interior, and (2) a unit entry door that leads from the exterior of a building or from a building common area into a unit. If an inspector observes a deficiency on the entry door of a single-family building, the deficiency must be recorded under [Unit], [Doors]. [Building Exterior], [Doors] would be marked as “NA”.
3. A lock is not required on any door. If a lock was installed it must be inspected to ensure that it functions as designed with the exception that common area interior doors (not unit entry) may have missing locks. Inspectors must distinguish between locks that 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.
4. Properties can use double sided deadbolts in all common areas that are not in the direct path of the unit egress from the building.
5. The deficiency *Deteriorated/Missing Caulking Seals* applies only to entry doors. When recording seal defects, inspectors must use their own professional experience to observe and determine whether a factory applied or professionally installed seal is or was present. Inspectors are not to record a deficiency for missing or deteriorated after-market seals applied by the residents.
  - a. Entry doors not designed with seals are not required by the UPCS protocol to have seals and shall not be recorded as a deficiency.
  - b. When the inspector observes light around a closed entry door with a seal that exhibits no evidence of seal damage, it is a deficiency that is to be recorded as [Light can be observed around the edges and you observe no seal deterioration] in the appropriate inspectable area.
  - c. Insulated glass and thermal pane doors that show evidence of seal leakage, such as condensation or discoloration between glass panes, must be recorded as [Seals/caulking is missing or deteriorated to the point the door is not weather-resistant (if designed to have seals)] in the appropriate inspectable area.

6. Screen, storm, and security doors are defined as follows and will be inspected as part of the associated Common Area or Unit:
  - a. A screen door has a screen with or without a locking device.
  - b. A storm door may have a glass panel but is designed to provide protection to the entry door.
  - c. A security door is designed to provide added security through strength and has additional locks and/or other locking mechanisms.
7. Holes left in doors from the removal of hardware must be evaluated as door surface damage.



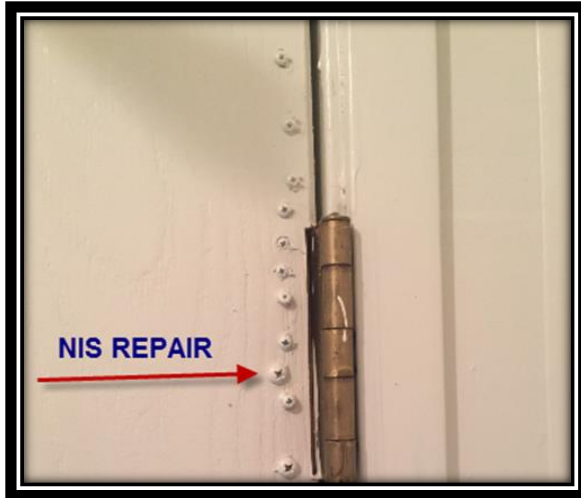
8. A door missing from its jamb or frame is recorded as [Door is missing] regardless of whether the door is in the immediate area or not.



9. Double doors that serve one door entrance are one door. Record as one missing door if one or both are missing.



10. Doors in units that have been removed by the property, other than in 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 it is recorded as a Missing Door deficiency.
11. If most doors within an area are painted or varnished, then any unpainted or unvarnished door must be recorded as a [Exterior, Common Area or Unit], [Doors], [appropriate floor level or room location], [type of door], [Surface is damaged], [Door has significant peeling, cracked, or no paint] deficiency. If most the doors are unpainted or unvarnished, do not record a deficiency.
12. A stick is no longer an acceptable alternative to an inoperable lock for a sliding glass door. A stick may be used as a secondary lock but cannot be used as a primary means of securing the door.
13. Two attempts shall be made varying the angle of the open door (e.g. 45°, 90°, etc.). If after two attempts the door does not latch it is a defect under the appropriate inspectable area.
14. Do not allow a resident or POA to open a window to allow a door to shut. The door should work when the windows are in an open or closed position.
15. During the inspection, the POA **cannot** repair the bi-fold door hardware (e.g. reinstalling the pin into the top or bottom track(s)).
16. Delaminated wood or metal door surfaces that are screwed together is not an acceptable repair and a deficiency shall be recorded under the inspectable area with an appropriate NIS Repair comment.



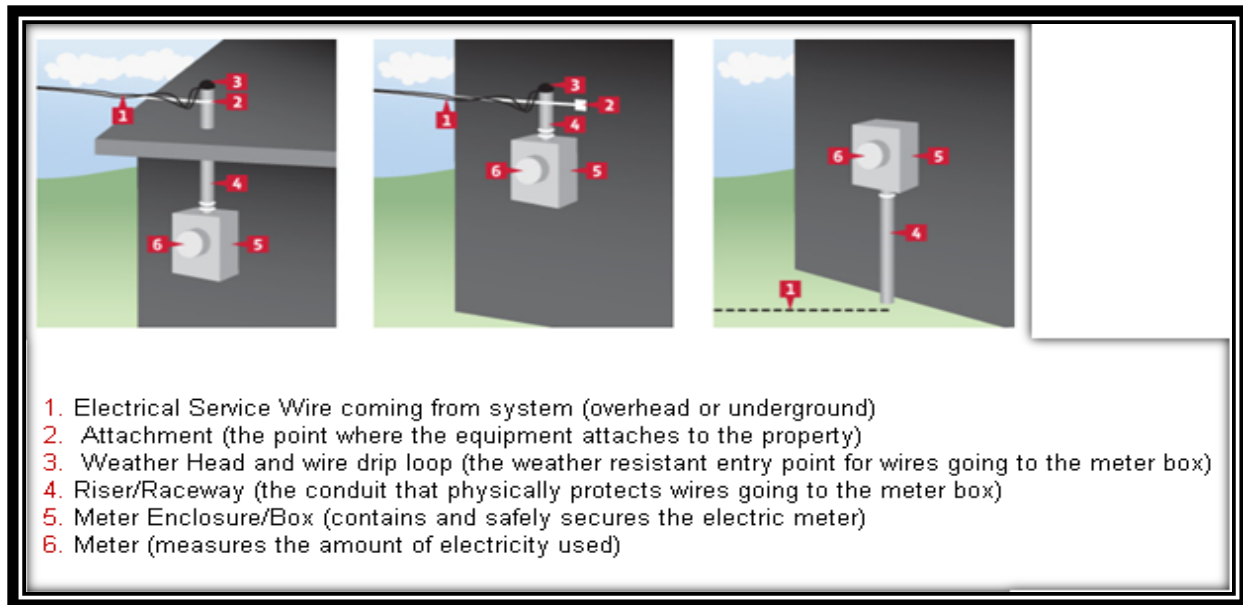
17. A missing strike/latch plate from the door frame shall be recorded as missing hardware under the appropriate inspectable area.



18. Group Homes are special use facilities, not unlike nursing homes, and the rule applicable to 504 units must be applied. If management chooses not to allow the clients to have locks on the doors, then the UPCS inspection protocol does not require them.

#### E. ELECTRICAL SYSTEM

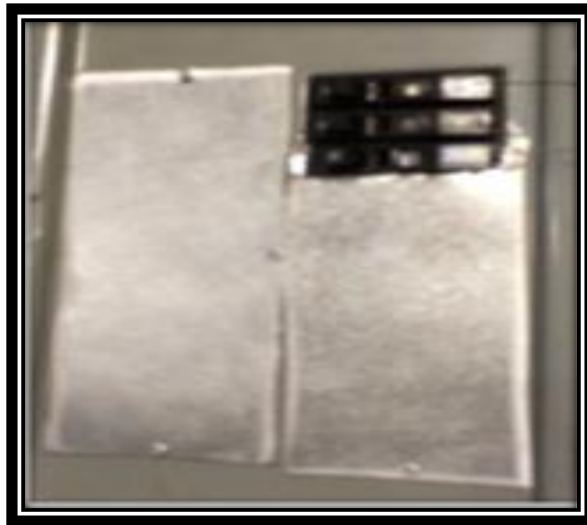
1. The inspector must record electrical deficiencies for electrical equipment that services more than one specific area of the building (e.g. main electrical panel) within Building Systems. Electrical deficiencies for electrical equipment that service a specific area of the building (e.g. community room, hallway, unit) must be recorded in their respective locations.
2. The inspector will not record a deficiency for missing covers or exposed bare wiring for low voltage (telephone lines, security Systems, etc.) or cable television wiring.
3. For the purposes of inspecting the property, all electrical components used to supply or control the supply of electricity to the building after the meter base are considered to belong to the property.



4. Do not inspect non-property owned utility boxes which include the meter base and supply service. Any observed Health and Safety defects are to be recorded, even if the utility box is non-property owned. Record them under [Health and Safety], [floor level (if applicable)], [Hazards], [Any Other - This does pose a risk of bodily injury] for that building or under [Site], [Health and Safety], [building or nearest building], [Hazards], [Any Other - This does pose a risk of bodily injury], as appropriate. If the Health and Safety defect is Life Threatening, it will not automatically appear on the EH&S report and will need to be manually tracked and recorded on the Notification of Exigent and Fire Safety Hazards Observed form at the end of that day's inspection.
5. Any electrical panel/box that is designed to have an interior cover but the cover is missing, exposing bare wires/connections at the time of inspection, will be recorded as [Missing Covers, exposing electrical connections] in the appropriate Inspectable area.
6. Electrical panels (breaker/fuse boxes) that are secured at the time of inspection (except for disconnects and timer boxes) must be made accessible to the inspector for inspection. Any electrical

panel (breaker/fuse box) that is not made accessible will be recorded as [Blocked access to electrical panel] in the appropriate Inspectable area.

7. Electrical Panels: The introduction of any foreign materials within the panel to cover or fill a crack or opening is prohibited and (e.g. caulking, spray foam, screws, etc.), is not an acceptable repair (NIS). It shall be recorded in the appropriate inspectable area as an "H&S – Electrical Hazard" under "Opening in the electrical panel are not properly covered". The only acceptable materials allowed in these type devices are those that are specifically designed, tested, and approved for this application. Below are examples of unacceptable repairs:



8. Timer and disconnects (all electrical boxes other than breaker/fuse) that are not secured must be inspected, provided that doing so will not interrupt electrical service. Secured means that it requires the use of a tool. Tools can be items such as keys for locks, cutters, screwdrivers, or other similar instruments.
9. If an exterior disconnect or timer box that is not associated with any other specific inspectable area has no cover resulting in exposed bare wires or connections, the inspector is to record this as a deficiency at [Building Exterior], [Health and Safety], [Electrical Hazards], [Exposed bare wires], regardless of the design of the box. If the disconnect is associated with a specific sample unit, common area or system, the deficiency would be recorded in that area.



10. An opening or gap must be measured to be **greater than a 1/4 inch between the breakers/fuses and the internal cover of an electrical panel** is an electrical hazard. This deficiency is to be recorded under the applicable inspectable area as [Site, Building Exterior, Building Systems, Common Areas or Unit], [Health and Safety], [appropriate building, floor level or room location (if applicable)], [Electrical Hazards], [Openings in electrical panels], [The openings in the electrical panels are not properly covered].
11. All surface mounted electrical devices must be inspected for any missing knockout(s). If missing, a deficiency will be recorded in [H&S], [Electrical Hazard], [Opening in electrical]



12. Exposed bare wires are defined as: Non-insulated, high voltage (110V/220V or higher) conductors, connectors, and terminals. Fully insulated conductors in an open junction box/pass through are not a defect. If exposed bare wire, un-insulated connectors, capped, or open terminal connections are visible in an open junction box/pass through the inspector will select the Decision: “The exposed bare wires ARE capped BUT NOT enclosed in a secured electrical box OR ARE NOT capped” resulting in an Exigent Health & Safety defect under [Health and Safety], [Electrical Hazards], [Exposed bare wires].
13. A missing elevator control panel cover must be recorded as [Systems], [Electrical System], [appropriate floor level], [Missing cover, exposing electrical connections], [The electrical connections/wires are NOT abandoned and capped] if the control panel was designed to have a cover. If a cover was not part of the original design do not record a [Missing cover, exposing electrical connections] deficiency. However, if the condition results in a life-threatening situation, it will need to be recorded under [Systems], [Health and Safety], [appropriate floor level], [Electrical Hazards], [Exposed bare wires], [The exposed bare wires ARE capped BUT NOT enclosed in a secured electrical box OR ARE NOT capped].
14. **Ground Fault Interrupter (GFI) - Inoperable** is an automatic non-life threatening Health and Safety deficiency when recorded. Disregard the comment in the definition that says, “If this condition is a health and safety concern, you must record it as ‘Health and Safety: Electrical Hazards.’”
15. **Inspection of Zip Ties:** If the inspector sees a reason why they should be tested (e.g. sun baked, color is worn and faded, etc.) and when tested it breaks off in their hands and

exposes bare electrical wiring or connections to be exposed, it is a defect. Otherwise, if the zip tie breaks when tested, but no bare wiring or connections are exposed, it is not a defect. This does not imply that every zip tie on every property must be tested. Professional common sense must be applied for this situation on a case-by-case basis.

16. **Tripped Breaker:** The POA can reset a tripped breaker if the breaker does not affect a life safety item such as call-for-aid or a smoke detector and there will be no deficiency observed. Note: The inspector should never turn on any breaker that is found to be in the “off” position, since he/she is not sure what appliance or dangerous condition that it might create (e.g. turns on stove). The POA should be given the option to turn on any breakers that are off. The exception to this is the testing of the GFCI and AFCI protected breakers.

## F. EXIT SIGNS

1. All exit signs need to be illuminated day and night either internally or externally. Exit signs designed with a testing feature are to be tested and must function as designed. If deficient, record under [Common Area], [Health and Safety], [appropriate floor level], [Emergency/Fire Exits], [Exit Signs] ...

## G. FHEO - 36-INCH-WIDE INTERIOR HALLWAYS

1. This inspectable item only applies to an occupied multi-story building with an elevator. In these buildings, all interior hallways to Units and building Common Areas must be at least 36 inches wide. For buildings with no elevator, record as “NA”.

## H. FHEO - ACCESSIBLE OUTSIDE COMMON AREAS

1. All FHEO inspectable items are intended to determine if the building/unit is compliant with FHEO requirements. (i.e. wheel chairs, walkers, etc.).
  - a. 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, patios, play areas, and freestanding and attached common buildings such as a laundry building. When selecting a location in the inspection software use “*Other Community Spaces*” unless there is a more appropriate location provided.

## I. FLOORS

1. Stains on soft flooring (e.g., carpeting) affecting at least 5% but less than 10% of the total similar soft floor material on any single **room** should be recorded as [appropriate Common Area], [Floors], [appropriate floor level], [Carpet is Missing/Damaged], [5% to less than 10% of any single room] resulting in a Level 1 deficiency. Stains affecting 10% to 100% will be recorded as [appropriate Common Area], [Floors], [appropriate floor level], [Carpet is Missing/Damaged], [10% to 50% of any single room].
  - a. Non-water stains on soft flooring are only applicable to Level 1 and Level 2; not Level 3 deficiencies.
  - b. Cracks on basement floors or slabs on grade are to be recorded under [Building Exterior], [Foundations], [Crack or Gap (applies to both walls and floors)] ...
  - c. Mismatched floor covering (color/texture) is acceptable in a common area if it is less than 5% of a single floor area. If it is 5% or more of a single floor area, it will be recorded as a Non-Industry Standard (NIS) repair for the mismatched (color/texture) floor coverings and

the level of severity (L1, L2, L3) will be based on the existing 4.0 definition for “Hard Floor Covering – Missing/Damaged” or “Carpet - Missing/Damaged”, whichever is appropriate. See example below:



#### J. HALLWAYS/STAIRS

1. A handrail is required for four or more risers not separated by a landing.
2. In the past, any stairs or landings (not under roof) outside the face of the building was to be addressed as part of the site. If a defect was observed it would be recorded as a site – walkways/steps defect. The new protocol will be as follows:
3. Any stairs that are attached to a building that service multiple units will be addressed as “Common Areas – Hall/Corridors/Stairs”. Below are two photos demonstrating this:





## K. HVAC

1. When a cover is missing on a convection or radiant heat system it may or may not create health and safety sharp edges or burn hazard. If it does result in a health and safety the following conditions may exist:
  - a. Sharp edges will be recorded as follows: [appropriate Common Area], [HVAC], [appropriate floor level], [Convection/Radiant Heat System Covers Missing or Damaged], [This condition may result in a Health and Safety concern] deficiency must be recorded. After selecting the "Finish" button for the deficiency a [Health and Safety] screen will automatically appear and the inspector should select [Sharp Edges - This could cause cutting].
  - b. If a burn hazard is also present, the inspector must record this hazard manually in [Health and Safety], [appropriate floor level], [Hazards], [Any Other - This Does pose a risk of bodily injury].
2. Gas HVAC flue vent piping shall be inspected to ensure that it has no gaps in the piping (sometimes hidden by tape) and the piping size runs from either one continuous size or runs from smaller to larger beginning with the smaller piping at the HVAC system.



## L. KITCHEN ITEMS

1. When qualifying a Common Area as a Kitchen the room must contain an area to store, prepare, and cook food. If all three criteria are not met, then do not inspect the room as a kitchen. A microwave is a substitute for a range/stove/oven to establish a kitchen, however it is not inspected and does not take the place of an inoperable range/stove/oven.
2. Cabinet deficiencies are based on defects observed on individual components (doors, drawers, or shelves) as a percentage of the same component's total for the entire cabinet system.

For example, in a common area kitchen:

- Damaged: One shelf      Total Components: 12 shelves = 8% damaged = NOD
- Damaged: Two doors      Total Components: 20 doors = 10% damaged = Level 2
- Damaged: Six      Total Components: 8 drawers = 75% damaged = Level 3

Inspector should record [Kitchen], [Kitchen Items], [appropriate floor level], [Kitchen Cabinets], [Cabinets, door, shelves, or laminate damaged or missing], [More than 50% of cabinets, doors, shelves, or laminate damaged or missing] which results in a "CA – Missing/Damaged Cabinets - Level 3" deficiency.

- a. Delaminating is to be recorded as cabinet damage when applicable. Surface chipping or finish deterioration is not a recordable defect.
  - b. An exhaust fan in a kitchen that has been intentionally blocked is a [Kitchen], [Kitchen Items], [appropriate floor level], [Range Hood/Exhaust Fans], [Exhaust fan does not function] ... deficiency, unless there is an operable window in the kitchen.
  - c. If the range hood is missing the filter, and there is no operable window in the area, an inoperable level three deficiency shall be recorded. The filter is an integral part of this appliance that significantly reduces the pollutants entering the motor housing and kitchen area. When the filter is missing, the inspector **will not** record a health and safety for sharp edges.
3. Inspecting Stoves and Ranges: (Inspector Notice 2009-02, Effective July 20, 2009 provides the following protocol for Inspecting the Unit stoves and Ranges)
    - a. Inspectors will no longer turn on or off any ranges/stoves/ovens. The POA must turn all ranges/stoves and ovens on and off during the inspection to allow the inspector to determine if the appliance functions as intended and record any observed deficiencies. The inspector must remain in close proximity from the time the POA turns the range/stove/oven on until it is turned off. If the POA refuses to turn it on and off, the inspector is to (1) record a deficiency as [Kitchen], [Kitchen Items], [appropriate floor level], [Range/Stove/Oven], [Gas or Electric...], [Burner(s) not functioning], [There are two or more burners that are not functioning]... and inform the POA of the Level 3 deficiency; (2) write "Property refused to turn on and off the range/stove/oven" in the comment section; (3) call the REAC TAC and report that the POA refused to turn the range/stove/oven on and off; and (4) record the REAC TAC reference number, reason, and description in the inspection software. Prior to the inspection remind the POA that the property representative should check for and remove all items that may be damaged from the top of burners and inside ovens before turning on the appliance.
    - b. Inspectors shall inspect/test both elements in electrical ovens. Meaning the broiler and bake elements are to be tested separately. If either element is inoperable it shall be recorded as a deficiency under inoperable oven with the appropriate comment.
    - c. If aluminum foil is in the oven or on top of the stove, this is not a defect.

- d. In a **common area** if flammable items are found on top of the stove or stored inside of the oven (e.g. pizza box, plastic containers/bags, etc.), it shall be recorded as a “**Hazards –Any Other Hazard**”.
  - e. If the stove is unplugged the inspector shall allow the POA to plug it in for proper testing for correct operation.
4. If a burner(s) is not functioning on a gas stove, the property representative must be given an opportunity to check the pilot light(s) and re-light it if it is out. If all burner(s) are operable after re-lighting the pilot, record a [Kitchen], [Kitchen Items], [appropriate floor level], [Range/Stove/Oven], [Gas Range/Stove/Oven], [A pilot light is out] deficiency. If a burner(s) still does not function after re-lighting or the property representative chooses not to check or light the pilot, record a deficiency for an inoperable burner(s).
  5. When burners have been removed from the stove for cleaning or repair and can be located during the inspection and reinstalled into the stovetop, the missing burners are not a deficiency. As with a gas stove, after they have been reinstalled they must be turned on and checked to determine if they are functioning.
  6. When control knobs have been removed from the stove, but can be located during the unit inspection and reinstalled on the stove, it is not a deficiency. If the knobs cannot be located, but the range and stove still functions properly, record the missing knobs as a [Kitchen], [Kitchen Items], [appropriate floor level], [Range/Stove/Oven], [Gas or Electric...], [A control knob is missing...] deficiency. Except in those cases where they have been removed to protect the safety of the resident such as an Alzheimer’s patient.
  7. If a kitchen sink has two separate sides, inspectors shall test both drains lines to evaluate for leaks.
  8. Sink sprayers are only evaluated for leaks. Inspectors are not to record a deficiency for a missing sink sprayer if one is not present.
  9. A one inch or less split or tear in the refrigerator gasket that **has been repaired** is no longer a defect. However, anything other than this will be recorded as a defect.

## M. LAUNDRY AREA

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

## N. LIGHTING

1. 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 refers to whether the fixture is broken. Bulbs are not addressed in the definition.
2. Fixture/lamp globes or bowls are not considered part of the lighting system. Do not record missing globes as a deficiency if the light functions.
3. Common area lighting deficiencies must be evaluated as cumulative totals throughout the building within each inspectable area. For example, if a building has a first and second floor laundry room with two lights in each room, one inoperable light fixture would be evaluated as 25% of the four-total common area laundry area lighting fixtures being inoperable.

## O. OUTLETS/SWITCHES

1. Missing Outlets/Switches: This applies to outlets and switches that are completely missing resulting in exposed electrical wires.
2. Damaged Outlets/Switches: This applies to outlets and switches that are so damaged that electrical connections are exposed. If the switch is inoperable or damaged with no exposed connections, evaluate this under Common Area lighting.
3. Any burnt electrical outlet shall be recorded under the appropriate inspectable area as [Health and Safety], [Hazards], [Any Other - This does pose a risk of bodily injury]. See an example of a burnt electrical outlet below.



## P. POOLS AND RELATED STRUCTURES

1. Swimming pools must be operational during the appropriate pool season for the geographical area (typically the summer months). During the remainder of the year a pool that is not operational is not a deficiency and must be recorded as "NOD."
2. Regardless of the season all pool related structures will be inspected per REAC protocol.

## Q. PATIO/PORCH/BALCONY

1. Damage to a concrete slab porch or entry stoop must be recorded in [Site], [Walkways/Steps] ... as applicable. **(This is now recorded under the exterior unless associated with a unit).**

## R. STORAGE

1. When there is a storage area designated by the property and it is in the basement, it will be inspected as part of the basement. If the storage area is located elsewhere, unless it is inside a sample unit basement, it is inspected as part of the Common Areas.

## S. WALLS

1. An inspector must evaluate [Trim is Damaged or Decayed] on any **one wall** as a percentage of the total trim on that **one wall** surface. (Missing trim must also be included in the calculation as it is considered a form of deterioration.)

2. Smoke, grease or dirt on wall surfaces that can be washed off is not considered deteriorated paint.
3. Fire walls between townhouse units are not evaluated for fire safety as part of the UPCS Protocol.
4. **Drywall Repair:** Sheetrock with mud and/or tape is the correct means of repair. Simply covering a hole or damaged drywall with plywood/laminate is not correct.
  - a. The exception to this rule regarding sheet rock repair is for intentional holes in the sheetrock to allow for access to plumbing, electrical, telephone, etc.
  - b. These access points shall be covered, secured and may use alternate materials other than sheetrock to cover the access point.
  - c. The inspector will require that a sampling of these access points covers be removed to verify the purpose of cover.
  - d. The inspector will write up any access point for needing paint if the color does not match the wall color in the area under “needs paint” with the appropriate NIS comment.

## T. WINDOWS

1. Sample buildings may be generated that contain no sample units. Therefore, window deficiencies may have to be recorded in different inspectable areas depending on whether the sample building has sample units to be inspected or not. They are to be recorded as follows:
  - a. If a sample building has sample units and common areas, record window deficiencies in the units and common areas in which they are observed. Health and Safety window deficiencies that are observed on non-sample units should be recorded under [Exterior or Common Area], [appropriate floor level (if applicable)], [Health and Safety], [Hazards], [Any Other - This does pose a risk of bodily injury].
  - b. If a sample building has no sample units to inspect, all unit windows must be visually inspected and deficiencies observed recorded in [Building Exterior], [Windows].... Inspectors must record all window deficiencies observed in common areas in the associated Common Area
2. Insulated glass and thermal pane windows that show evidence of seal leakage such as condensation or discoloration between glass panes must be recorded as [Caulk, Seals, or Glazing Compound (includes Thermopane or insulated windows)], [Deteriorated or Missing], [There is condensation or discoloration between the glass panes of a Thermopane] in the appropriate inspectable area.





3. When fixed security bars are present that cover a window that is the only secondary means of emergency egress from a floor area (e.g. room, unit, building) on the third or lower floor, or on any floor that the window is the designed egress point to a designated fire escape, the deficiency [Windows], [appropriate floor level or room location], [Security Bars], [Window is designed for egress, but exiting is severely limited or impossible], [Security bars are damaged or improperly constructed/installed] must be recorded in the appropriate inspectable area. However, a deficiency must not be recorded for windows that are not large enough or not otherwise designed for egress.
4. A hasp attached to moveable security bars is not a deficiency if 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 [Windows], [appropriate floor level or room location], [Security Bars], [Windows is designed for egress, but exiting is severely limited or impossible], [Security bars that are designed to open cannot be readily opened or require a key or other special tool] deficiency in the appropriate Inspectable area, when the window is the only secondary means of emergency egress from a floor area on the third or lower floor.
5. Child safety window guards that are normally found in apartment and public hallway windows to protect children 10 years of age or younger from falling to the outside of the building, are typically lightweight metal construction and can be dislodged with a reasonable degree of force when necessary and should not be considered as blocked egress **unless** they are improperly installed or constructed.
6. All common area windows in buildings sampled must be fully opened and inspected (tested) for correct operation. Exception: Windows that have the locking mechanism located above 8 feet.
7. The inspector must use their own professional judgment to determine if the level of effort to open a window constitutes a deficiency for being inoperable and/or a blocked egress.
8. A stick is no longer an acceptable alternative to an inoperable lock for a window. A stick may be used as a secondary lock but cannot be used as a primary means of securing the window.
9. All window locks are to be evaluated for function. For example: if a window is designed with two separate locks and one does not properly operate, then the inspector is to record an inoperable lock level 3 in the appropriate area for the one inoperable/missing lock.
10. If a wood or vinyl window is originally designed with two locks, they both must function as designed. If either lock is deficient it must be removed and replaced with a similar locking device. Thumb latches are not an acceptable alternative for wood or vinyl windows.
11. Thumb latches are an acceptable alternative only for aluminum framed windows if they can be operated without the use of a tool. If they cannot be removed by hand, the deficiency shall be recorded under the appropriate area.
12. Sash pins are **NO LONGER** acceptable as a substitute for defective balance(s), or a replacement lock.
13. Caulking used to cover a crack in a window is not allowable/acceptable repair and should be recorded under the correct inspectable area with an appropriate NIS Repair comment.
14. If a window opening has an air conditioning unit, then the inspector must evaluate the window for damage, thermal pane seal damage, and health and safety deficiencies. Do not evaluate the operation of the window if the air conditioning unit is installed in a window.
15. On the third floor and below: Windows that cannot be opened and provide the only secondary means of egress from a floor area (e.g. room, unit, or building) must be recorded as a [Windows], [appropriate floor level or room location], [Lock/Operability, Window cannot be opened...] deficiency, with a [Health and Safety], [appropriate floor level or room location], [Emergency/Fire Exits], [Blocked]... deficiency.

16. On the fourth floor and above: Windows that are damaged and cannot be opened on the fourth floor and above when there are no other operable windows in the same floor area must be recorded as a [Windows], [appropriate floor level or room location], [Lock/Operability], [Window cannot be opened...]. Only record a [Health and Safety], [appropriate floor level or room location], [Emergency/Fire Exits], [Blocked]... deficiency if it also provides access to a fixed fire escape route (landing, ladder, roof, etc.).
17. If an operable window's locking mechanism is located 8' feet or below from the floor area; then the inspector shall test the functionality of the window and locking mechanism(s). However, if the operable window is located above 8' from the floor area; then the window shall not be test for functionality. Regardless of the height of the window from the floor area; all windows shall still be evaluated for other deficiencies such as cracks, thermal pane, missing panes, etc.



## UNIT

### A. UNIT GENERAL INFORMATION

1. Inspecting resident versus property owned items:
  - a. Refrigerators, stoves, and window air conditioners owned by the resident must be inspected and deficiencies recorded as if the appliances are owned by the property.
  - b. Resident owned furniture or storage that prohibits access to call-for-aids (pull cords) or creates a blocked egress must be cited as [Call-For-Aid] ... or [Health and Safety], [appropriate room location], [Emergency/Fire Exits] ..., as applicable. In addition, improperly stored flammable materials will be recorded as [Health and Safety], [appropriate room location], [Flammable/Combustible Materials] ..., regardless of ownership.
  - c. All other **resident owned property** will be inspected for Health and Safety deficiencies only. Health and Safety deficiencies observed on **property owned by residents** must be recorded as [Health and Safety], [appropriate room location], [Hazards], [Any Other - This Does Pose a Risk of Bodily Injury]. Examples of resident owned property are fire extinguishers, mirrors, picture frames, fan covers, and play equipment.
2. The property representative 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 a property representative or the resident will not move the furniture or open a closed door to provide access, the inspector must select an alternate unit.
3. The property representative must provide the inspector with access to physically inspect for correct operation all inspectable items including such items as windows, stoves/ovens, AC units, call-for-aids, and light switches. If the inspector cannot access inspectable items, the inspector is to record these items as defective.
4. For client rooms in group home, special needs facilities, and nursing home, record a shared kitchen or bathroom in a sample unit under Units when it may be accessed only through the client rooms. If the client rooms sharing the bathroom or kitchen are both sample units do not record the same deficiency under each unit. Rather record the defect in one unit and mark the other as "NOD" with an appropriate note in the Building Information Comment box. If a shared kitchen or bathroom is accessed through a common area, deficiencies must be recorded under Common Area. If no kitchen or bathroom may be accessed through the unit, record "NA" for [Unit], [Kitchen Items] and/or [Bathroom Items] and make the appropriate note in the Building Information Comment box.
5. The inspector is required to inspect all occupied units in the sample that have a disconnected utility, for both Public Housing and Multifamily Housing Properties. The Inspector is to report any impacted equipment and/or system because of disconnected utilities, in accordance with the UPCS inspection protocol. The inspector is to indicate which type of utility is disconnected in the "Utilities Off?" section on the Unit Profile screen and provide additional comments if necessary.

**Inspector Note** – Often, when properties are making or have made repairs to walls, floors, ceilings, etc., the new materials will not be an exact match to the original material colors. The inspector must use their best judgement and professional common sense when determining whether this is an acceptable repair or not.

## B. BATHROOM

1. All sinks, showers, and tubs must be inspected by operating the **hot and cold** water faucets or controls. If no sinks or tubs in the unit have hot water, the inspector will record a defect for an inoperable water heater and will not record a defect for each of the sinks and/or tubs in the unit.
2. A missing or inoperable mechanical stopper (in either a tub or sink) shall be recorded as a [Bathroom Items], [Bathroom], [Bathroom Sink or Shower or Tub (Unit)], [A stopper is missing (only if there is no stopper in the visible area)].
3. A mechanical sink stopper must be completely removed if replaced with a rubber stopper. i.e.: pull, metal stopper, etc. If all evidence has not been removed then a deficiency shall be recorded as [Bathroom Items], [Bathroom], [Bathroom Sink or Shower or Tub (Unit)], [A stopper is missing (only if there is no stopper in the visible area)].
4. Shower head leaks when water is turned on are to be recorded in the appropriate area either as a level 1 defect “contained” or a level 3 defect “not contained”.
5. A missing shower head shall be recorded as a [Bathroom Items], [Bathroom], [Shower or Tub (Unit), [Missing Hardware] Level 3.
6. If the water cutoff valve under a sink or behind a toilet is turned off, the inspector **can** allow the POA to turn on the valve to allow proper testing of the sink or toilet.
7. A missing shower floor drain cover is a deficiency and should be recorded under [Units] [Bathroom Items] [Shower/Tub – Damaged/Missing].
8. Do not record a [Bathroom Items], [Bathroom], [Bathroom] [Ventilation/Exhaust System] ... deficiency for bathrooms constructed without either an exhaust fan or a window.
9. When a roof exhaust fan that vents bathrooms in a high rise is inoperable, record a [Building Systems], [Roof Exhaust System], [Floor R], [Damaged to the point of being inoperable] or [Building Systems], [Roof Exhaust System], [Floor R], [Missing...] deficiency as applicable, for the roof exhaust fan. Inspectors must not record a deficiency for each unit bathroom that the roof exhaust fan services.

## C. CALL-FOR-AID

1. Call-For-Aid, as installed, must serve its intended function and when tested must function on the first test. For example, the bell sounds an alarm, the light turns on, and/or off-site personnel are notified when the system is activated.
2. When recording a ... [Tested - Call-For-Aid as installed does not serve its intended function] deficiency a comment must be provided (e.g. blocked, coiled-up, not fully extended/tied up, not baseboard height, taped to the wall, etc.).
3. The correct length of the Call-For-Aid cord should be baseboard height. If not, then a deficiency must be recorded as ... [Tested - Call-for-Aid as installed does not serve its intended function].
4. If the property has replaced the old Call-for-Aid system with a new electronic neck or hand-held type of system, the presence of any part of an inoperable system that remains must be recorded as ... [Alerts local entities (on-site)], [Unable to test system] with an appropriate comment.
5. Call-for-Aid Systems will not be evaluated for deficiencies if all pull stations have been removed from the resident’s apartments and all that remains is the light fixture over the unit’s door and/or the old enunciator panel is still mounted on a wall in the lobby. If any part of the old system remains inside the unit, then the inspector must evaluate this situation as an inoperable Call-for-Aid system.

## D. CEILING

1. Hole, paint, and water stains/water damage/mold/mildew defects are cumulative when they appear on any one ceiling surface (per room).
2. Smoke, grease or dirt on ceiling surfaces that can be washed off is not considered deteriorated paint.
3. When a repair is done to a textured ceiling (popcorn/stippled) it is very difficult to make the repair blend seamlessly into the surrounding ceiling. The UPCS protocol allows for any single floor area (room) to have a cumulative total of less than four square feet of this type of ceiling repair. If the repair exceeds four square feet in any single floor area it will be recorded as an NIS repair in the appropriate area.

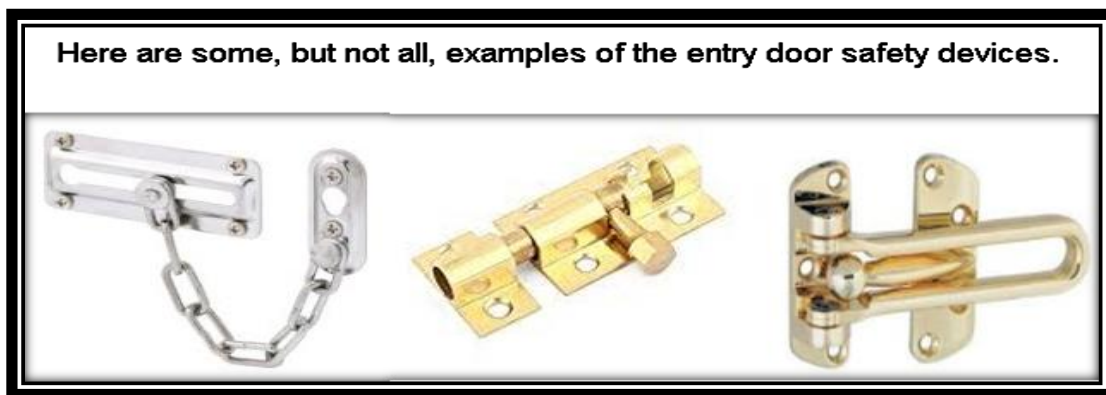


4. **Drywall Repair:** Sheetrock, tape and mud are the correct materials to repair holes in sheetrock. Simply covering a hole or damaged drywall with plywood/laminate is not correct.
  - a. The exception to this rule regarding sheet rock repair is for intentional holes in the sheetrock to allow for access to plumbing, electrical, telephone, etc.
  - b. These access points shall be covered, secured and may use alternate materials other than sheetrock to cover the access point.
  - c. The inspector will require that a sampling of these access points covers be removed to verify the purpose of cover.
  - d. The inspector will write up any access point for needing paint if the color does not match the wall color in the area under “needs paint” with the appropriate NIS comment.

## E. DOORS

1. Sample buildings may be generated that contain no sample units. Therefore, any door deficiencies may have to be recorded in different inspectable areas depending on whether the sample building has sample units to be inspected or not. Record as follows:
  - a. If a sample building has sample units, record all deficiencies observed on the unit entry doors in the associated units. Do not record deficiencies for unit entry doors on units not in the sample.
  - b. If a sample building has no sample units to inspect, record all deficiencies observed on any unit entry doors on the building exterior in [Building Exterior], [Doors]..., and all deficiencies observed on any unit entry doors in a common area hall or corridor in [Common Areas], [Halls/Corridors/Stairs], [Doors]... In these cases, disregard the *Note* in the [Building Exterior], [Doors]... deficiency that says, “*This does not include unit doors.*”

- c. If common area doors exist, whether exterior or interior, any observed defects are to be recorded in the associated common area into which the door swings. The only exceptions are for doors that swing outward leading to the building exterior. In this case record any deficiencies identified in [Building Exterior], [Doors]...
2. There are two types of entry doors: (1) a building entry door that leads from the exterior of a building into the building interior, and (2) a unit entry door that leads from the exterior of a building or from a building common area into a unit. If an inspector observes a deficiency on the entry door of a single-family building, the deficiency must be recorded under [Unit], [Doors]. [Building Exterior], [Doors] would be marked as "NA".
  3. A lock is not required on any door. If a lock was installed it must be inspected to ensure that it functions as designed with the exception that common area interior doors (not unit entry) may have missing locks. Inspectors must distinguish between locks that 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.
  4. Entry doors are often installed with multiple locking and/or security devices such as: a privacy lock, a single cylinder deadbolt, and a slide/chain type security lock. Each will be inspected for correct operation if present during the inspection. Exception: The inspector, when inspecting the slide/chain type security devices, must use his/her judgment to determine if it was installed by the property or the resident. I.e. If most units have these type devices then it will be inspected and if found deficient it will be recorded, but if the inspector observes that only some of the units have these devices, the inspector will not record a defect.



5. The deficiency Deteriorated/Missing Caulking Seals applies only to entry doors. When recording seal defects, inspectors must use their own professional experience to observe and determine whether a factory applied or professionally installed seal is or was present. Inspectors are not to record a deficiency for missing or deteriorated after-market seals applied by the residents.
  - a. Entry doors not designed with seals are not required by the UPCS protocol to have seals and shall not be recorded as a deficiency.
  - b. When the inspector observes light around a closed entry door with a seal that exhibits no evidence of seal damage, it is a deficiency that is to be recorded as Light can be observed around the edges and you observe no seal deterioration in the appropriate inspectable area.
  - c. Insulated glass and thermal pane doors that show evidence of seal leakage, such as condensation or discoloration between glass panes, must be recorded as Seals/caulking is

missing or deteriorated to the point the door is not weather-resistant (if designed to have seals)]  
in the appropriate inspectable area.

6. Screen, storm, and security doors are defined as follows and will be inspected as part of the associated Common Area or Unit:
  - a. A screen door has a screen with or without a locking device.
  - b. A storm door may have a glass panel but is designed to provide protection to the entry door.
  - c. A security door is designed to provide added security through strength and has additional locks and/or other locking mechanisms.
7. Holes left in doors from the removal of hardware must be evaluated as door surface damage.



8. A door missing from its jamb or frame is recorded as [Door is missing] regardless of whether the door is in the immediate area or not.



9. Double doors that serve one door entrance are one door. Record as one missing door if one or both doors are missing.



10. Doors in units that have been removed by the property, other than in 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 it is recorded as a Missing Door deficiency.
11. If most doors within a unit are painted or varnished, then any unpainted or unvarnished door must be recorded as a [Exterior, Common Area or Unit], [Doors], [appropriate floor level or room location], [type of door], [Surface is damaged], [Door has significant peeling, cracked, or no paint] deficiency. If most the doors are unpainted or unvarnished, do not record a deficiency.
12. A stick is no longer an acceptable alternative to an inoperable lock for a sliding glass door. A stick may be used as a secondary lock but cannot be used as a primary means of securing the door.
13. If a resident has added a door sweep or wreath, our protocol allows resident or POA to remove the item to demonstrate that the unit door closer works properly.
14. Two attempts shall be made varying the angle of the open door (e.g. 45<sup>o</sup>, 90<sup>o</sup>, etc.). If after two attempts the door does not latch it is a defect under the appropriate inspectable area.
15. **Do not** allow a resident or POA to open a window to allow a door to shut. The door should work when the windows are in an open or closed position.
16. During the inspection, the POA **cannot** repair the bi-fold door hardware (e.g. reinstalling the pin into the top or bottom track(s)).
17. Delaminated wood or metal door surfaces that are screwed together are not an acceptable repair and a deficiency shall be recorded under the inspectable area with an appropriate NIS Repair comment.





18. A unit bathroom or unit entry door has a hole or holes with a diameter ranging from ¼" or greater; then it shall be recorded as a level 3 deficiency – [Doors] [Bathroom/Entry] [Damaged Surface] [Holes] [Does Not Result]. If the diameter is smaller than ¼" it is not a deficiency.
19. A missing strike/latch plate from the door frame shall be recorded as missing hardware under the appropriate inspectable area.

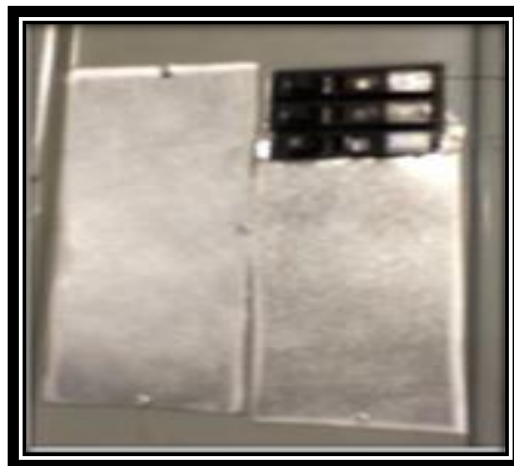


20. Group Homes are special use facilities, not unlike nursing homes, and the rule applicable to 504 units must be applied. If management chooses not to allow the clients to have locks on the doors, then the UPCS inspection protocol does not require them.

#### F. ELECTRICAL SYSTEM

1. Any electrical panel/box that is designed to have an interior cover but the cover is missing, exposing bare wires/connections at the time of inspection, will be recorded as [Missing Covers, exposing electrical connections] in the appropriate Inspectable area.
2. The inspector will not record a deficiency for missing covers or exposed bare wiring for low voltage (telephone lines, security Systems, etc.) or cable television wiring.

3. Electrical panels (breaker/fuse boxes) that are secured at the time of inspection (except for disconnects and timer boxes) must be made accessible to the inspector for inspection. Any electrical panel (breaker/fuse box) that is not made accessible will be recorded as [Blocked access to electrical panel] in the appropriate Inspectable area.
4. Electrical Panels: The introduction of any foreign materials within the panel to cover or fill a crack or opening is prohibited and (e.g. caulking, spray foam, screws, etc.), is not an acceptable repair (NIS). It shall be recorded in the appropriate inspectable area as an "H&S – Electrical Hazard" under "Opening in the electrical panel are not properly covered". The only acceptable materials allowed in these type devices are those that are specifically designed, tested, and approved for this application. Below are examples of unacceptable repairs:



- a. Timer and disconnects (all electrical boxes other than breaker/fuse) that are not secured must be inspected, if doing so will not interrupt electrical service. Secured means that it requires the use of a tool. Tools can be items such as keys for locks, cutters, screwdrivers, or other similar instruments.

- b. An opening or gap when measured and found to be **greater than a 1/4 inch between the breakers/fuses and the internal cover of an electrical panel** is an electrical hazard. This deficiency is to be recorded under the applicable inspectable area as [Site, Building Exterior, Building Systems, Common Areas or Unit], [Health and Safety], [appropriate building, floor level or room location (if applicable)], [Electrical Hazards], [Openings in electrical panels], [The openings in the electrical panels are not properly covered].
- c. All surface mounted electrical devices must be inspected for any missing knockout(s). If missing, a deficiency will be recorded in [H&S], [Electrical Hazard], [Opening in electrical]



- d. Exposed bare wires are defined as: Non-insulated, high voltage (110V/220V or higher) conductors, connectors, and terminals. Fully insulated conductors in an open junction box/pass through are not a defect. If exposed bare wire, un-insulated connectors, capped, or open terminal connections are visible in an open junction box/pass through the inspector will select the Decision: “The exposed bare wires ARE capped BUT NOT enclosed in a secured electrical box OR ARE NOT capped” resulting in an Exigent Health & Safety defect under [Health and Safety], [Electrical Hazards], [Exposed bare wires].
5. **Unplugged Appliance:** An inspector must use their best judgment whether an unplugged appliance such as a dryer, is in use or not.
  6. **Disposals:** If the garbage disposal is tripped the inspector will allow the POA to press the reset button; if it works there is no deficiency. However, if the POA must use any tools to make repairs to the garbage disposal, it is a defect. If a garbage disposal is missing the plate underneath and exposes bare wires and/or bare connections, it is an electrical defect
  7. **Ground Fault Interrupter (GFI) - Inoperable** is an automatic non-life threatening Health and Safety deficiency when recorded. Disregard the comment in the definition that says, “If this condition is a health and safety concern, you must record it as ‘Health and Safety: Electrical Hazards.’”
    - a. GFI and Arc Fault Circuit Interrupter (AFCI) circuit breakers in electrical panel boxes must be tested by pushing the test button to trip the breaker and resetting it; which is to be only done by the inspector. Deficiencies for inoperable AFCI circuit breakers are to be recorded under [Common Area], [Electrical System], [appropriate room location], [GFI does not function when self-test button is pressed]. **It is strongly recommended that the inspector notify the POA’s**

that these circuits are going to be interrupted and effect devices such as: computers, oxygen pumps, televisions, etc.

- b. **Tripped Breaker:** The POA can reset a tripped breaker if the breaker does not affect a life safety item such as call-for-aid or a smoke detector and there will be no deficiency observed. Note: The inspector should never turn on any breaker that is found to be in the “off” position, since he/she is not sure what appliance or dangerous condition that it might create (e.g. turns on stove). The POA should be given the option to turn on any breakers that are off. The exception to this is the testing of the GFCI and AFCI protected breakers.

## G. FLOORS

1. Stains on soft flooring (e.g., carpeting) affecting 5% to 100% of the total similar soft floor material **in a room** should be recorded as [Floors], [appropriate room location], [Carpet is Missing/Damaged], [5% to less than 10% of any single room] resulting in a Level 1 deficiency. Non-water stains on soft flooring are only applicable to Level 1; not to Level 2 or Level 3.
2. When determining floor damage severity, the total percentage is based on total area of similar material floor covering **in a single room**.
3. Cracks on basement floors **or slab on grade** are to be recorded under [Building Exterior], [Foundations], [Crack or Gap (applies to both walls and floors)] ...
4. Mismatched floor covering (color/texture) is acceptable in a unit if it is less than 5% of a single floor area. If it is 5% or more of a single floor area, it will be recorded as a Non-Industry Standard (NIS) repair for the mismatched (color/texture) floor coverings and the level of severity (L1, L2, L3) will be based on the existing 4.0 definition for “Hard Floor Covering – Missing/Damaged” or “Carpet - Missing/Damaged”, whichever is appropriate. See example below:



## H. HALLWAYS/STAIRS

1. A handrail is required for four or more risers not separated by a landing.

2. In the past, any stairs or landings (not under roof) outside the face of the building was to be addressed as part of the site. If a defect was observed it would be recorded as a site – walkways/steps defect. The new protocol will be as follows:
- a. Any stairs that are attached to the building that service a single unit will be recorded as part of the individual unit that it services. See the two examples below:



## I. HVAC SYSTEM

1. When a cover is missing on a convection or radiant heat system it may or may not create health and safety sharp edges or burn hazard.
2. If it does result in a health and safety the following conditions may exist:
  - a. Sharp edges will be recorded as follows: [appropriate Common Area], [HVAC], [appropriate floor level], [Convection/Radiant Heat System Covers Missing or Damaged], [This condition may result in a Health and Safety concern] deficiency must be recorded. After selecting the "Finish" button for the deficiency a [Health and Safety] screen will automatically appear and the inspector should select [Sharp Edges - This could cause cutting].
  - b. If a burn hazard is also present, the inspector must record this hazard manually in [Health and Safety], [appropriate floor level], [Hazards], [Any Other - This Does pose a risk of bodily injury].
3. Gas HVAC flue vent piping shall be inspected to ensure that it has no gaps in the piping (sometimes hidden by tape) and the piping size runs from either one continuous size or runs from smaller to larger beginning with the smaller piping at the HVAC system.
  - a. Inspectors are required to inspect either the heat or the air conditioning system, but not both. Inspect whichever is in season at the time of the inspection and verify that the system is functioning as intended. ***This is to include resident owned window air conditioner units.***
  - b. If a window air conditioner unit is unplugged, the inspector should allow the POA to plug it in and then the **inspector** should test it for correct operation. (HVAC is seasonal).

## J. KITCHEN

1. When qualifying a Kitchen in a client room, the room must contain an area to store, prepare, and cook food. If all three of those criteria are not met, then do not inspect the room as a kitchen. A microwave can be substituted for a range/stove/oven to establish a kitchen; however, it should not be inspected and does not take the place of an inoperable range/stove/oven.
2. Cabinet deficiencies are based on defects observed on individual components (doors, drawers, or shelves) as a percentage of the same component's total for the entire cabinet system.

For example, in a sample unit's kitchen:

- Damaged: One shelf Total Components: 12 shelves = 8% damaged = NOD
- Damaged: Two doors Total Components: 20 doors = 10% damaged = Level 2
- Damaged: Six drawers Total Components: 8 drawers = 75% damaged = Level 3

Inspectors should record [Kitchen Items], [Kitchen], [Kitchen Cabinets], [Cabinets, door, shelves, or laminate damaged or missing], [More than 50% of cabinets, doors, shelves, or laminate damaged or missing] which results in a "*Unit – Cabinets - Missing/Damaged (Kitchen) - Level 3*" deficiency.

3. Delaminating is to be recorded as cabinet damage when applicable. Surface chipping or finish deterioration is not a recordable defect.
4. An exhaust fan in a kitchen that has been intentionally blocked is a [Kitchen Items], [Kitchen], [Range Hood/Exhaust Fans], [Exhaust fan does not function] ... deficiency, unless there is an operable window in the kitchen.
5. If the range hood is missing the filter, and there is not an operable window in the area, an inoperable level three deficiency shall be recorded. When the filter is missing, the inspector will not record a health and safety for sharp edges.

6. Inspecting Stoves and Ranges: (Inspector Notice 2009-02, Effective July 20, 2009 provides the following protocol for Inspecting the Unit stoves and Ranges)
  - a. Inspectors will no longer turn on or off any ranges/stoves/ovens. The POA must turn all ranges/stoves and ovens on and off during the inspection to allow the inspector to determine if the appliance functions as intended and record any observed deficiencies. The inspector must remain in close proximity from the time the POA turns the range/stove/oven on until it is turned off. If the POA refuses to turn it on and off, the inspector is to: (1) record a deficiency as [Kitchen Items], [Kitchen], [Range/Stove/Oven], [Gas or Electric...], [Burner(s) not functioning], [There are two or more burners that are not functioning]... and inform the POA of the Level 3 deficiency, (2) write "Property refused to turn on and off the range/stove/oven," in the comment section, (3) call the REAC TAC and report that the POA refused to turn the range/stove/oven on and off and, (4) record the REAC TAC number, reason, and description in the inspection software. Prior to the inspection remind the POA to check for and remove all items that may be damaged from the top of burners and inside ovens before turning on the appliance.
  - b. Inspectors shall inspect/test both elements in electrical ovens. Meaning the broiler and bake elements are to be tested separately. If either element is inoperable it shall be recorded as a deficiency under inoperable oven with the appropriate comment.
  - c. If aluminum foil is in the oven or on top of the stove, this is not a defect.
  - d. In a unit if flammable items are found on top of the stove or stored inside of the oven (e.g. pizza box, plastic containers/bags, etc.), it shall be recorded as a "**Hazards –Any Other Hazard**".
  - e. If the stove is unplugged the inspector shall allow the POA to plug it in for proper testing for correct operation.
  - f. If a burner(s) is not functioning on a gas stove, the property representative must be given an opportunity to check the pilot light(s) and re-light it if it is out. If all burner(s) are operable after re-lighting the pilot, record a [Kitchen], [Kitchen Items], [appropriate floor level], [Range/Stove/Oven], [Gas Range/Stove/Oven], [A pilot light is out] deficiency. If a burner(s) still does not function after re-lighting or the property representative chooses not to check or light the pilot, record a deficiency for an inoperable burner(s).
  - g. When burners have been removed from the stove for cleaning or repair and can be located during the inspection and reinstalled into the stovetop, the missing burners are not a deficiency. As with a gas stove, after they have been reinstalled they must be turned on and checked to determine if they are functioning.
  - h. When control knobs have been removed from the stove, but can be located during the unit inspection and reinstalled on the stove, it is not a deficiency. If the knobs cannot be located, but the range and stove still functions properly, record the missing knobs as a [Kitchen], [Kitchen Items], [appropriate floor level], [Range/Stove/Oven], [Gas or Electric...], [A control knob is missing...] deficiency. Except in those cases where they have been removed to protect the safety of the resident such as an Alzheimer's patient.
7. Inspecting Sinks:
  - a. If a kitchen sink has two separate sides, inspectors shall test both drains lines to evaluate for leaks.
  - b. Sink sprayers are only evaluated for leaks. Inspectors are not to record a deficiency for a missing sink sprayer if one is not present.

8. Inspecting Refrigerators:

- a. A one inch or less split or tear in the refrigerator gasket that **has been repaired** is not a defect. However, anything other than this will be recorded as a defect.

**K. LAUNDRY AREA**

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

**L. LIGHTING**

1. Fixture/lamp globes or bowls are not considered part of the lighting system. Do not record missing globes as a deficiency if the light functions.
2. Inspectors are no longer required to inspect rooms designed with no light switch for lighting related deficiencies. However, the inspector is still required to inspect permanent light fixtures for proper operation per the UPCS definition.
3. A closet is considered as a separate room for light fixture assessments.

**M. OUTLETS/SWITCHES**

1. Missing Outlets/Switches: The deficiency [Outlet/Switches], [appropriate room location], [Switch is missing or Outlet is missing] ... applies only to outlets and switches that are completely missing resulting in exposed electrical wires.
2. Damaged Outlets/Switches: Outlets and switches that are so damaged that electrical connections are exposed must be evaluated under [Health and Safety], [appropriate room location], [Electrical Hazards], [Exposed bare wires], [The exposed bare wires are not capped...]. If the switch is inoperable or damaged with no exposed connections, evaluate this under [Unit], [Lighting]...
3. Any burnt electrical outlet shall be recorded under the appropriate inspectable area as [Health and Safety], [Hazards], [Any Other - This does pose a risk of bodily injury]. See an example of a burnt electrical outlet below.





## N. PATIO/PORCH/BALCONY

1. Record damage to balusters and side rails in Baluster/Side Railings. All other deficiencies observed on unit patios, porches, and balconies must be recorded in the associated unit in their respective area.
2. Damage to a concrete slab porch or entry stoop that are attached to the building and service a single unit will be recorded as part of the individual unit that it services. Any deficiencies observed to the porch/stoop **Floor** will be recorded in [Unit – Floors - Patio/Porch/Balcony – Rotted/Deteriorated Subfloor] and **Railing** damage will be recorded in [Unit – Baluster/Side Railings - Patio/Porch/Balcony].

## O. SMOKE DETECTOR

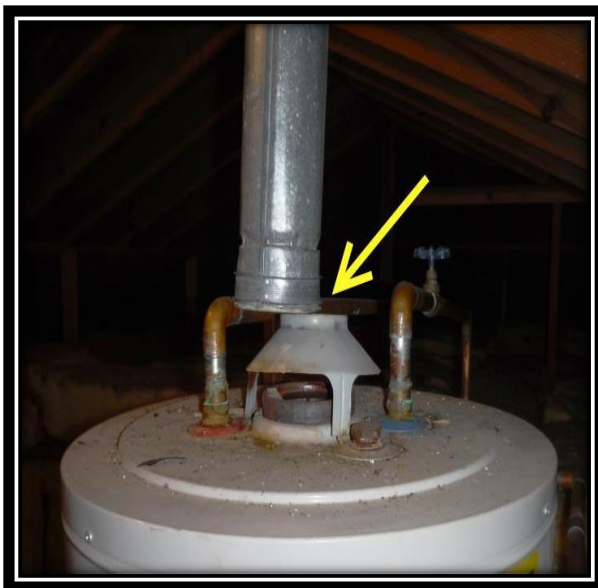
1. Smoke detectors within a unit must be operable and located on each living level including the basement, which excludes a crawl space or unfinished attic. If two or more smoke detectors are on the same level in visible proximity and cannot be isolated from one another (such as closing a door), at least one of the smoke detectors must function as it should.
2. If a smoke detector is not located in the unit/client room in nursing homes, group homes and assisted living facilities, it is not a defect. However, if a smoke detector does exist within the client room it must be inspected for correct operation unless it is an integral part of the building's fire alarm system and current inspection documentation is provided. If the smoke detectors in these types of facilities are installed only in the common areas such as hallways and offices, the inspector will record "NOD" for [Unit], [Smoke Detector] and enter a comment stating that smoke detectors are in common areas only in the Building Comments field located on the Building screen.
3. Inspectors are **not** to allow POA representatives to replace smoke detector batteries **prior to** the deficiency being recorded.

## P. WALLS

1. An inspector must evaluate [Damaged/Deteriorated Trim], [Trim is Damaged or Decayed] on any one wall as a percentage of the total trim on that one wall surface. Missing trim must also be included in the calculation as it is considered a form of deterioration.
2. Smoke, grease, or dirt on wall surfaces that can be washed off is not considered deteriorated paint.
3. **Drywall Repair:** Sheetrock with mud and/or tape is the correct means of repair. Simply covering a hole or damaged drywall with plywood/laminate is not correct.
  - a. The exception to this rule regarding sheet rock repair is for intentional holes in the sheetrock to allow for access to plumbing, electrical, telephone, etc.
  - b. These access points shall be covered, secured and may use alternate materials other than sheetrock to cover the access point.
  - c. The inspector will require that a sampling of these access points covers be removed to verify the purpose of cover.
  - d. The inspector will write up any access point for needing paint if the color does not match the wall color in the area under "needs paint" with the appropriate NIS comment.

## Q. WATER HEATER

1. The end of the pressure relief valve or its extension on a hot water heating system must be no more than 18 inches from the floor or piped to a designed system, otherwise it must be recorded as a deficiency.
2. Water Heater is never recorded as “NA” (except for units with no domestic water connections) regardless of whether the tank is located within the unit or not. Record deficiencies for the hot water system in either [Unit], Water Heater or [Building Systems], [Domestic Water], whichever is most appropriate.
3. Occasionally, in a sample unit the water heater is installed under the kitchen cabinet and there is no access to the tank. In cases where the water heater is inaccessible or located in a permanently secured space, the inspector will test the hot water at the tap and if no signs of leaks are observed, then he/she will record NOD for Unit/Hot Water Heater.
4. A leaking hose bib that services a single unit will be recorded under [Unit], [Water Heater]. When the hose bib services a single common area or multiple units it will be evaluated as [Systems], [Domestic Water].
5. Gas water heater vent flue piping shall be inspected to ensure that it has no gaps in the piping (sometimes hidden by tape) and the piping size runs from either one continuous size or runs from smaller to larger beginning with the smaller piping at the water heater.



## R. WINDOWS

1. Sample buildings may be generated that contain no sample units. Therefore, window deficiencies may have to be recorded in different inspectable areas depending on whether the sample building has sample units to be inspected or not. They are to be recorded as follows:
  - a. If a sample building has sample units and common areas, record window deficiencies in the units and common areas in which they are observed. Health and Safety window deficiencies that are observed on non-sample units should be recorded under [Exterior or Common Area].

[appropriate floor level (if applicable)], [Health and Safety], [Hazards], [Any Other - This does pose a risk of bodily injury].

- b. If a sample building has no sample units to inspect, all unit windows must be visually inspected and deficiencies observed recorded in [Building Exterior], [Windows].... Inspectors must record all window deficiencies observed in common areas in the associated Common Area.
2. Insulated glass and thermal pane windows that show evidence of seal leakage such as condensation or discoloration between glass panes must be recorded as [Caulk, Seals, or Glazing Compound (includes Thermopane or insulated windows)], [Deteriorated or Missing], [There is condensation or discoloration between the glass panes of a Thermopane] in the appropriate inspectable area.



3. When fixed security bars are present that cover a window that is the only secondary means of emergency egress from a floor area (e.g. room, unit, building) on the third or lower floor, or on any floor that the window is the designed egress point to a designated fire escape, the deficiency [Windows], [appropriate floor level or room location], [Security Bars], [Window is designed for egress, but exiting is severely limited or impossible], [Security bars are damaged or improperly constructed/installed] must be recorded in the appropriate inspectable area. However, a deficiency must not be recorded for windows that are not large enough or not otherwise designed for egress.
4. A hasp attached to moveable security bars is not a deficiency if 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 [Windows], [appropriate floor level or room location], [Security Bars], [Windows is designed for egress, but exiting is severely limited or impossible], [Security bars that are designed to open cannot be readily opened or require a key or other special tool] deficiency in the appropriate Inspectable area, when the window is the only secondary means of emergency egress from a floor area on the third or lower floor.
5. Child safety window guards that are normally found in apartment and public hallway windows to protect children 10 years of age or younger from falling to the outside of the building, are typically lightweight metal construction and can be dislodged with a reasonable degree of force when necessary and should not be considered as blocked egress **unless** they are improperly installed or constructed.

6. All windows in units sampled must be fully opened and inspected (tested) for correct operation. Exception: Windows that have the locking mechanism located above 8 feet.
7. The inspector must use their own professional judgment to determine if the level of effort to open a window constitutes a deficiency for being inoperable and/or a blocked egress.
8. A stick is no longer an acceptable alternative to an inoperable lock for a window. A stick may be used as a secondary lock but cannot be used as a primary means of securing the window.
9. All window locks are to be evaluated for function. For example: if a window is designed with two separate locks and one does not properly operate, then the inspector is to record an inoperable lock level 3 in the appropriate area for the one inoperable/missing lock.
10. If a wood or vinyl window is originally designed with two locks, they both must function as designed. If either lock is deficient it must be removed and replaced with a similar locking device. Thumb latches are not an acceptable alternative for wood or vinyl windows.
11. Thumb latches are an acceptable alternative locking mechanism for aluminum framed windows if they can be operated without use of a tool. If they cannot be removed by hand, the deficiency shall be recorded under the appropriate area.
12. Sash pins are **NO LONGER** acceptable as a substitute for defective balance(s), or a replacement lock.
13. Caulking used to cover a crack in a window is not allowable/acceptable repair and should be recorded under the correct inspectable area with an appropriate NIS Repair comment.
14. If a window opening has an air conditioning unit, then the inspector must evaluate the window for damage, thermal pane seal damage, and health and safety deficiencies. Do not evaluate the operation of the window if the air conditioning unit is installed in a window.
15. On the third floor and below: Windows that cannot be opened and provide the only secondary means of egress from a floor area (e.g. room, unit, or building) must be recorded as a [Windows], [appropriate floor level or room location], [Lock/Operability, Window cannot be opened...] deficiency, with a [Health and Safety], [appropriate floor level or room location], [Emergency/Fire Exits], [Blocked]... deficiency.
16. On the fourth floor and above: Windows that are damaged and cannot be opened on the fourth floor and above when there are no other operable windows in the same floor area must be recorded as a [Windows], [appropriate floor level or room location], [Lock/Operability], [Window cannot be opened...]. Only record a [Health and Safety], [appropriate floor level or room location], [Emergency/Fire Exits], [Blocked]... deficiency if it also provides access to a fixed fire escape route (landing, ladder, roof, etc.).
17. If an operable window is located 8' feet or below from the floor area; then the inspector shall test the functionality of the window and locking mechanism(s). However, if the operable window is located above 8' from the floor area; then the window shall not be test for functionality. Regardless of the height of the window from the floor area; all windows shall still be evaluated for other deficiencies such as cracks, thermal pane, missing panes, etc.

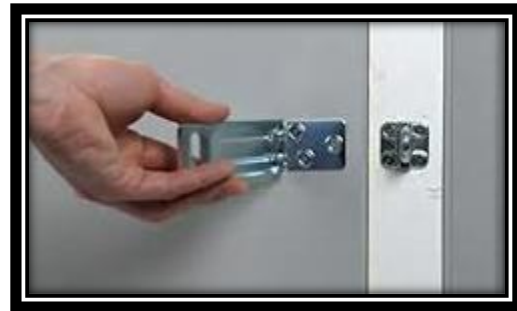
## HEALTH AND SAFETY (H&S)

**Inspector note:** When noting the location of an H&S defect, the inspector should pay close attention to the software prompts to avoid recording the defect in the wrong location.

### A. EMERGENCY/FIRE EXITS

#### 1. On the third and lower floors:

- a. The Blocked/Unusable deficiency is applicable to blocked or unusable emergency/fire exits on these floor areas for room, unit, or building. If designed, these floors must have a minimum of two independent unobstructed exits, one of which must be a door (primary). If not designed for two exits, then only one will be evaluated.
- b. If a unit entry door has a hasp lock (regardless if pad lock is present), a blocked primary egress shall be recorded. Examples of hasp lock below:



- c. If the only window in a floor area for a room, unit or building, is blocked by a window air conditioner (whether it is secured or not), furniture, an inoperable window sash, or any other obstruction, and the area has only one exit door, the inspector must record a Blocked/Unusable deficiency.
  - d. The inspector must use their own professional judgment to determine if the level of effort to open a window constitutes a deficiency for being a blocked egress.
  - e. If a floor area has an obstructed window but at least one other window that is unobstructed or a second unobstructed door, there is no blocked egress.
- #### 2. On the fourth and higher floors:
- a. All floor areas for a room, unit or building on the fourth or higher must have at least one unobstructed exit door as the primary means of egress. If a floor area is designed with a window or door that leads to a fire escape, this must be considered a second means of egress and must be evaluated as a potential blocked egress.
  - b. If a unit entry door has a hasp lock (regardless if pad lock is present), a blocked primary egress shall be recorded.
3. The note in the Blocked/Unusable definition that states, "This does not apply to individual units," must be disregarded.
  4. All blockages that limit a person's ability to exit a room in case of emergency are a deficiency. Professional common sense and inspector knowledge are to be applied.
  5. Evaluating unit closets for blocked egress:

- a. A closet door is considered primary egress from the closet area. Any lock, chain, damaged hardware or other device that prevents egress from a floor area, which includes all doors on all floors, is considered a blocked egress. Any blockage that limits a person's ability to exit a room in the event of an emergency is considered a deficiency. Professional common sense and inspector knowledge are to be applied.
  - b. A padlock or any other locking mechanism used by the property to secure the unit mechanical closet will not be recorded as a blocked egress. Additionally, similar locking mechanisms, whether installed by the resident or property, to secure the unit exterior storage closet or shed will not be recorded as a blocked egress.
6. In the comment field for the deficiency, the inspector must 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 (e.g., family, elderly, handicapped), when deciding of the applicability of this defect.

#### **B. COMMON AREA DOORS – BLOCKED FIRE EXITS WITH DOUBLE KEYED DEADBOLTS**

1. Double-sided keyed deadbolt locks in Common Areas are an EH&S deficiency when they serve as the entrance or exit points for residential units into hallways, lobbies, stairways, and similar areas. This does not apply to common areas in residential buildings that are not the intended egress for residential units such as laundry rooms, shops, and offices.

#### **C. UNIT DOORS – BLOCKED FIRE EXITS WITH DOUBLE KEYED DEADBOLTS**

1. Double-sided keyed knob locks and deadbolts, when observed on doors that serve as one of the two required means of egress from a unit floor area, are a Health & Safety, Emergency/Fire Exits, Blocked/Unusable deficiency. This applies to all doors on all floors that serve as a main or primary means of exit. A primary exit door is the main means of egress from a floor area such as a bedroom, kitchen, or living room.

#### **D. FLAMMABLE MATERIALS**

1. Items that must be considered when evaluating improperly stored flammable materials:
  - a. If an inspector observes flammable materials still in the original container (such as, but not limited to: hair spray, other types of aerosol cans, finger nail polish remover, butane lighter fluid, charcoal lighter fluid, paint thinner, etc.), and they are being stored in a safe place (such as under a kitchen sink, hall closet, etc.), then an inspector should not record improperly stored flammable materials.
  - b. If the above items are being stored in close proximity to an open flame, electrical or heat source (such as, but not limited to: a gas hot water heater, a gas HVAC unit, electric heaters, electrical switches/outlets, electrical panels, lighting, etc.), then improperly stored flammable materials should be recorded.
  - c. If easily combustible items (such as, but not limited to: paper, plastics, boxes, clothes, etc.) are being stored in close proximity to an open flame or heat source, then improperly stored flammable materials should be recorded.
  - d. Lawnmower/gasoline that is properly stored in a garage is not recorded as an H&S deficiency.
  - e. If a unit has a storage room that is only accessible from outside of the unit (and not accessible from within the unit), then flammable materials such as gasoline, propane, and kerosene can be stored in that storage room without it being improperly stored flammable materials.

- f. Propane tanks or gas power equipment stored outside of a building, but in close proximity to the building should not be recorded as improperly stored flammable materials.

#### **E. INFESTATION**

1. If the inspector actually observes bed bugs, he/she will record the deficiency “H&S – Infestation” with the appropriate comment.

#### **F. LEAD BASED PAINT**

1. It is now a requirement that the inspector take a photo of the Lead Base Paint Inspection cover page. The cover page shall be property specific. It shall show that it is the Lead Base Inspection report and the property name and address will match that of the property being inspected. (See page 6 for specific details)