



U.S. Department of Housing and Urban Development
Washington, D.C. 20410

OFFICE OF PUBLIC AND INDIAN HOUSING
REAL ESTATE ASSESSMENT CENTER

Inspector Notice No. 2020-01

TO: All HUD Inspectors Certified in the use of the Uniform Physical Condition Standards (UPCS) Inspection Protocol

FROM: James E. Cunningham
Inspector Administration (IA)

SUBJECT: Coronavirus (Covid-19) Inspection Protocol

DATE ISSUED: September 29, 2020

EFFECTIVE DATE: October 5, 2020

This notice establishes guidance to all UPCS inspectors who conduct physical inspections of HUD assisted and insured properties in response to the nation-wide health crisis associated with the Covid-19 pandemic. This notice remains effective until amended, superseded, or rescinded.

Applicability

The requirements in this notice apply to physical inspections conducted by all certified inspectors on behalf of HUD and the Real Estate Assessment Center (REAC). This notice also applies to HUD assisted and insured properties subject to UPCS inspection (24 CFR § 5.701) and other projects involving inspected properties under the REAC physical inspection protocol (24 CFR § 266.507).

Background

Due to the wide-spread health emergency associated with Covid-19, on March 16, 2020, the Real Estate Assessment Center (REAC) postponed physical inspections on all properties out of concern for the health, safety, and welfare of residents. As well as, public housing authority (PHA) staff and property owners and agents (POA), federal/contract inspectors, and other HUD employees.

During this time, REAC developed a heat map based on Covid-19 public health data from Johns Hopkins University and health risk scoring methodology from the Harvard Global Health Institute that categorizes states and localities into four risk categories to assist with return to operations strategies, and to prioritize safe practical means to resume inspection activities.

Heat Map Risk Status

- (1) Low Risk – Green
- (2) Moderately Low Risk – Yellow
- (3) Moderately High Risk – Orange
- (4) High Risk – Red

In addition to a property's public health status, REAC will not inspect properties that are designed for the elderly or serve a tenant population consisting of at least 51% of the elderly.

REAC will collaborate with program and field offices to internally prioritize properties and evaluate trends to forecast hotspots and safe zones throughout the United States. Despite REAC's pre-planning efforts, resuming physical inspections will require deference and flexibility for those involved and HUD Quality Assurance (QA) and REAC-Certified inspectors must exercise an abundance of caution. HUD QA and certified inspectors will likely encounter circumstances where a scheduled inspection cannot occur as planned, or even after the inspector has arrived on-site, due to health and safety concerns. An inspector should consult with the contractor and/or HUD to ensure a property meets HUD's inspection criteria before conducting an inspection.

On August 7, 2020, a heat map and a list of counties categorized by risk level was posted on REAC's website and updated weekly with current information.

Procedures

This notice requires inspectors to adhere to the following procedures:

1.0 Pre-Inspection Clarification:

- 1.1 Certified Inspector (CI) will notify the Public Housing Agency or owner and/or owner agent (POA) 14 days prior to the inspection date. During this call, the CI will ask if there are any Covid-19 cases on the property, is the property designated for the elderly or serve a majority elderly population. If so reported by the POA, the CI shall:
 - 1.1.1 Report the inspection uninspectable (RU) in Secured Systems.
 - 1.1.2 Inform the Technical Assistance Center (TAC) (888) 245-4860 and obtain a TAC number for the call.
 - 1.1.3 Send an email notification to Covid19inspectioninquiry@hud.gov.
- 1.2 A second call shall be made two (2) working days prior to the inspection. CI will re-confirm with the POA that there are no known cases of Covid-19 during this call. If so reported, the CI shall follow the guidance listed under 1.1.
 - 1.2.1 Option 1: If the reported Covid-19 cases are limited to one or more dwellings, on either the initial or follow-up calls, and *all parties do not agree to continue* with the inspection of the remaining four inspectable areas (e.g., site, building exterior, building systems, and common areas), the inspection shall be cancelled by the CI. If cancelled, the CI shall follow the guidance listed under 1.1.
 - 1.2.2 For POA reported non-Covid-19 and other health-related issues, the CI shall follow normal REAC protocol and seek additional guidance from HUD, as necessary.
- 1.3 If the area of the inspection changes to a color other than GREEN on the [REAC Site Heat Map \(RSHM\)](#)ⁱ on the day of travel, CI shall cancel the inspection and follow the guidance listed under 1.1.
 - 1.3.1 No inspections shall occur in an area that is other than GREEN on the RSHM Heat Map, even after the 14-day notification has been issued.

2.0 Inspection Period Clarification:

- 2.1 Personal Protective Equipment (PPE) (e.g., Minimum: mask and gloves) are required to be worn throughout all phases of the inspection process.
- 2.2 On the first day of the inspection, the CI shall ensure that he/she has not tested positive for Covid-19 in the last 30 days (Documentation should be maintained by each CI).
- 2.3 If requested by the POA, CI shall submit to a temperature check each day of the inspection.
 - 2.3.1 Upon entering each unit in the sample, CI shall either sanitize or put on new gloves each time and wipe down their equipment.
 - 2.3.2 CI shall follow CDC guidance on the [sanitizing their hands](#)ⁱⁱ, [gloves \(Video\)](#)ⁱⁱⁱ and [electronics/equipment](#)^{iv}.
- 2.4 All POA participants on the inspection are required to wear the minimum recommended PPE throughout the duration of inspection process, in accordance with local and state directives. When there are no state or local requirements, the POA is required to wear a mask and gloves. If the POA or any other participant refuses to wear the minimum required PPE, CI shall inform the participants of the following:
 - 2.4.1 Refusal to wear PPE is grounds for stopping the inspection and uploading it as unsuccessful.
 - 2.4.2 If there is still a refusal to wear the PPE CI shall stop the inspection, notify TAC, record the TAC reference number, notify their Contractor, and upload the inspection as unsuccessful.
- 2.5 CI shall maintain social distancing throughout the entire inspection. In units this requirement limits the number of escorts to one (1) POA member.
 - 2.5.1 CI shall recommend the POA ask the tenants of smaller units to step outside the dwelling during the duration of the inspection. If the tenants refuse, and the CI cannot maintain social distances, CI shall not enter the unit. CI shall mark the unit in their DCD as un-inspectable (e.g., Resident Refusal), and proceed to the RAPID generated alternate unit, per REAC protocol.
- 2.6 If the RAPID required sample cannot be met CI shall process the inspection as “Sample Not Met”, per the current UPCS protocol.
- 2.7 Re-confirm with the POA at the start of each day of the inspection that there have been no reports of a dwelling with a case of Covid-19. If there is a case of Covid-19 reported during the inspection period, and not all parties agree to continue the inspection, the following procedures are to be followed:
 - 2.7.1 CI will halt inspection of any remaining dwellings and limit the inspection to the remaining 4 inspectable areas (e.g., site, building exterior, building systems, and common areas).
 - 2.7.1.1 CI will record all dwellings reporting Covid-19 in the RAPID software under the respective Unit Profiles. In the Unit Comments box the inspector shall write the words “Covid Concerns” as shown in the example, select the reason “Resident Refusal” from the drop down box, and click “Save”:

Unit Profile

Unit Profile

Sample Unit Number 7 Unit Number 505 No. of Bedrooms 3

If unit cannot be inspected, select a reason: Resident Refusal

Utilities Off?

Electricity?

Gas?

Water?

Unit Comments COVID Concerns

Previous Next

Observations

Sample Status Excluded not in Universe

Unit Inspection Status Not Yet Started

Click the Record/View Observations button to record/view unit observations.
Note that this button will remain disabled until the unit profile is completed.

Record/View Observation

- 2.8 Throughout the inspection process CI is not to lay any inspection equipment (computer, cell phone, etc.) on any building component, furniture, or resident belonging. In those cases where the CI's equipment is set down the CI is to wipe down that surface and their equipment prior to moving forward with the inspection.
- 2.9 CI shall not dispose of any PPE in a dwelling or site refuse container.

3.0 Post Inspection Covid-19 Guidelines:

- 3.1 Conclude the inspection in accordance with Standard UPCS RAPID Inspection Mode Protocol.
- 3.2 After leaving the property office or meeting place, remove all PPE and accessories, package and store these items in a container, and properly dispose of all items off site.

4.0 Covid-19 Testing of Inspectors:

- 4.1 All certified inspectors must be tested for Covid-19 prior to their first inspection and every 30-days thereafter until otherwise directed by HUD. All certified inspectors shall maintain proof of a negative test result prior to an inspection *for each inspection* for a period of 24 months.
- 4.2 A certified inspector is prohibited from conducting an inspection after testing positive for Covid-19 within 30-days preceding the start of an inspection until he/she is retested and tests negative for Covid-19 prior to conducting another inspection. All certified inspectors working under contract or by agreement must collaborate with contractors and/or business partners to satisfy HUD's 30-day Covid-19 testing requirement prior to conducting inspections.
- 4.3 Important: Should HUD modify the Covid-19 testing requirement e.g., increase the frequency from every 30-days to every 15-days, all certified inspectors must adhere to the modified testing requirement.

Administration

REAC will perform ongoing and regular re-evaluations and validations of the properties that have received 14-day notices and notify PHAs and POAs, in writing, if the status of the scheduled inspection changes. If a property is located in a county which experiences an adverse change in public health conditions (e.g. the county moves from Green to Yellow) after the 14- day notification is given to the PHA or POA, REAC will postpone the inspection for at least 6 weeks. This will mean the counties where the properties were located will need to be rated Green for an additional six consecutive weeks or reporting periods before a new 14-day notification can be issued.

In all circumstances, REAC will consider the following factors to determine if an inspection at a property – located in a county that meets the low public health risk criteria during the entirety of the initial 45-day notification period and the subsequent 14-day property-specific notification period (e.g. Green for 59 consecutive days) – will continue:

- Property is in a jurisdiction currently in a phase of reopening; thus, allowing substantial in person commerce (e.g. inside restaurant dining, in-store shopping).
- Covid-19 cases in the property's locality have been trending downward and remaining flat for a minimum of 14 days. Related public health data (e.g. ICU beds) is similarly positive.

- There are no known and specific Covid-19 issues or outbreaks at the PHA or property in question regardless of the locality's phase of reopening or case trends.
- Air/rail/car travel to and from the property can be achieved with appropriate safety precautions.
- Two business days before the start of an inspection, REAC plans to perform a final validation of the criteria if new data is available and notify PHAs, POAs and contractors accordingly.

If you have questions about this notice, please contact the Technical Assistance Center (TAC) at 1-888-245-4860 or via email (REAC_TAC@hud.gov).

ⁱ https://www.hud.gov/program_offices/public_indian_housing/reac

ⁱⁱ <https://www.cdc.gov/handwashing/when-how-handwashing.html>

ⁱⁱⁱ https://www.cdc.gov/vhf/ebola/hcp/ppe-training/n95respirator_gown/doffing_20.html

^{iv} <https://www.cdc.gov/coronavirus/2019-ncov/community/disinfecting-building-facility.html>