

HUD's Real Estate Assessment Center (REAC)
COVID-19 FAQs
Public & Multifamily Housing Property Inspections



November 13, 2020

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**ANSWERS ABOUT RESUMING UNIFORM PHYSICAL CONDITION STANDARDS (UPCS)
INSPECTIONS FOR PUBLIC HOUSING AND MULTI-FAMILY PROPERTIES**

<p>1. How will properties be selected for inspection?</p>	<p>Properties will be selected for inspection based on county COVID-19 risk factors. REAC has developed a methodology at the county level to implement inspections and manage risk during the COVID-19 pandemic.</p> <p>Under the current approach, inspections will generally be scheduled in counties that are considered low risk for six consecutive weeks according to data from Johns Hopkins University and the Harvard Global Health Institute. Utilizing this data, REAC’s Research and Development (R&D) division has devised a heatmap and Excel spreadsheet of the health criticality rankings.</p> <p>To view these tools, visit our website at: https://hud.gov/program_offices/public_indian_housing/reac. This requirement will reduce the health risks to property staff, residents, and contract inspectors.</p>
<p>2. My property is over-due for an inspection but is in a high-risk county. Will it be inspected?</p>	<p>Until further notice, only Multifamily properties located in counties considered low risk for at least six consecutive weeks will be inspected. If a Multifamily property that is overdue for an inspection does not meet the low-risk criteria during the pandemic, it will be prioritized once normal operations can safely resume. Public housing developments are not being inspected, except where a Public Housing Authority has requested a FY2020 PHAS assessment; or under limited circumstances, for developments that require an emergency inspection.</p>
<p>3. How is REAC determining county COVID-19 risk?</p>	<p>The source for COVID infection data is the COVID-19 Data Repository by the Center for Systems Science and Engineering at Johns Hopkins University: https://github.com/CSSEGISandData/COVID-19</p> <p>The source for health risk score methodology is 'Key Metrics for COVID Suppression.' July 1, 2020. Harvard Global Health Institute, Harvard University, Cambridge, MA: https://globalhealth.harvard.edu/</p>
<p>4. How often will REAC update the risk information?</p>	<p>REAC expects to update the website weekly utilizing the most recent information available.</p>

<p>5. How do I know if a property is due for an inspection?</p>	<p>For Multi-Family (MF) properties, the ideal future date (IFD), or date the inspection should occur, can be found in Secure Systems, PASS Scheduler module.</p> <p>For Public Housing (PH) properties, the IFD can be found in the Secure Systems Public Housing Assessment System (PHAS) module. The user should go to the most recent fiscal year (FY) published score and follow the Physical link.</p> <p>To determine which property will be inspected, REAC will follow the low risk criteria listed previously.</p> <p>For the link to Secure Systems please visit: https://www.hud.gov/program_offices/public_indian_housing/react/online</p>
<p>6. Will a list of properties that are scheduled for inspection be published?</p>	<p>No. In accordance with Notice PIH-2019-02/H-2019-04, Standardization of REAC Inspection Notification Timelines, the 14-day scheduling notification for PH and non-insured MF is in effect. For further information, please review the notice located at: https://www.hud.gov/sites/dfiles/PIH/documents/PIH-2019-02.pdf</p>
<p>7. What about inspections that were awarded prior to REAC's suspension of inspections?</p>	<p>Currently only inspections that have been determined low-risk for six consecutive weeks will be scheduled for both MF and PH. Contract inspectors are expected to complete previously awarded inspections by September 30, 2021. It is expected that this additional time will allow all properties to be inspected only when the current risk criteria has been met.</p>
<p>8. Will the inspections be completed in-person or virtually?</p>	<p>At this time, only in-person inspections for UPCS will be conducted. REAC may consider remote inspections in the future.</p>
<p>9. Will HUD require inspectors to be tested for COVID-19?</p>	<p>Yes. 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 <i>for each inspection</i> for a period of 24 months.</p>

<p>10. Will inspectors be required to take any precautions to reduce the risk of spreading the virus?</p>	<p>Yes, REAC is requiring inspectors to:</p> <ul style="list-style-type: none"> • be tested for COVID-19 on a regular basis; • wear PPE including masks and gloves; • frequently use hand sanitizer; • practice physical distancing; and • follow state and local guidelines. <p>Inspectors may also decide to take additional precautionary measures in accordance with CDC guidance.</p>
<p>11. Will HUD require inspectors to self-quarantine between inspections?</p>	<p>No. HUD is not requiring inspectors to quarantine between inspections. However, inspectors must follow State and Local health guidelines including quarantine requirements in the state the inspection will occur.</p>
<p>12. Will NSPIRE Demonstration Inspections also resume?</p>	<p>Yes. As REAC returns to operations, NSPIRE will be following the overall REAC COVID protocol, with the addition of testing remote video technology in low risk areas.</p>

ANSWERS ABOUT THE SCHEDULING PHASE OF INSPECTIONS

<p>13. If a property receives the 14-day notice from a contract or federal inspector, but prior to the inspection date the county risk level changes, will the inspection be cancelled?</p>	<p>Yes, the inspection will be cancelled. REAC has procedures in place to identify this situation. However, if the property becomes aware of the change prior to REAC's notification, the representative should inform the inspector. And if the inspector becomes aware of the change prior to REAC's notification, the inspection should be reported uninspectable (RU) in Secure Systems.</p>
<p>14. What is the protocol if there are positive cases at a property that is scheduled for inspection (in a low-risk county)?</p>	<p>The property representative should inform the inspector as soon as possible. If the property representative and inspector agree, the inspection may continue as scheduled. For additional information, please refer to Inspector Notice No. 2020-01.</p>
<p>15. What if an inspector is travelling from a high-risk area?</p>	<p>Inspectors must abide by State and Local travel restrictions. During the scheduling notification call, the property representative may ask from where the inspector will be travelling.</p> <p>Inspectors must research and follow any travel restrictions to and from their scheduled inspections, including quarantine or testing requirements.</p>

<p>16. Can a property representative refuse an inspection due to pandemic concerns?</p>	<p>Yes. Although HUD believes it is taking reasonable precautions to minimize risk, by following all requirements outlined in the procurement vehicles used for UPCS inspections and mentioned in these FAQs and State and Local public health guidance, there may be cases and locations where HUD needs to consider the property representative’s concerns and postpone the inspection.</p> <p>In accordance with Notice PIH-2019-02/H-2019-04, Standardization of REAC Inspection Notification Timelines, the 14-day scheduling notification for PH and non-insured MF is in effect. For further information, please review the notice located at: https://www.hud.gov/sites/dfiles/PIH/documents/PIH-2019-02.pdf</p>
<p>17. What if a property representative refuses an inspection for reasons other than the pandemic?</p>	<p>If a property representative does not allow a scheduled inspection to proceed, the property may receive an inspection score of zero in accordance with PIH-2019-02/H-2019-04. The notice is located at: https://www.hud.gov/sites/dfiles/PIH/documents/PIH-2019-02.pdf</p>

ANSWERS ABOUT INSPECTION DAY

18. Will UPCS protocol differ?	<p>No. UPCS protocols will be followed, including the 14-day scheduling notification.</p> <p>The UPCS Compilation Bulletin and other documents are located at: https://www.hud.gov/program_offices/public_indian_housing/reac/products/prodpass</p>
19. Can a property require an inspector to have their temperature taken before they begin an inspection?	<p>Yes, if it is a recommendation or required by the State or Local guidelines.</p>
20. Will the inspector ask about the health status of the property staff or residents?	<p>Yes, the inspector will inquire about any known COVID-19 cases currently at the property. In accordance with the Health Insurance Portability and Accountability Act (HIPAA) no Personally Identifiable Information (PII) will be requested.</p>
21. Will the inspector change gloves between units?	<p>Gloves will either be changed or sanitized before entering a unit.</p>
22. Will PPE be provided to the residents of units selected for the sample?	<p>Neither HUD nor the inspector will provide PPE; however, the Department recommends that residents coordinate with the POA to obtain PPE, if needed. (The CARES Act enabled PHAs to use Operating Fund Supplemental assistance for PPE for residents in units selected for the sample.)</p> <p>The inspector is required to maintain physical distance during the inspection, and residents are encouraged to wear masks.</p>

<p>23. How many people will enter a unit during the inspection?</p>	<p>HUD is limiting the number of property representatives to two; and only one escort and the inspector can enter a unit. Physical distancing will be practiced by the inspector. In addition, the inspector will request that the property escort ask residents to maintain appropriate physical distance during the inspection.</p>
<p>24. What if a resident in a sample unit is at a high risk and does not want to allow the inspector to enter?</p>	<p>The Inspector will follow UPCS protocol for a “tenant refusal,” and an alternate unit will be selected.</p> <p>The UPCS Compilation Bulletin and other documents are located at: https://www.hud.gov/program_offices/public_indian_housing/reac/products/prodpass</p>
<p>25. What if the property representative halts an inspection before it is completed?</p>	<p>If the property representative halts the inspection for concerns such as a resident in a sample unit seems to be exhibiting symptoms of COVID-19, the inspector, in accordance with UPCS protocol, will select an alternate unit.</p> <p>The UPCS Compilation Bulletin and other documents are located at: https://www.hud.gov/program_offices/public_indian_housing/reac/products/prodpass</p>

ANSWERS ABOUT INSPECTION RESULTS

26. Do EHS deficiencies need to be mitigated?	<p>Yes. Mitigation for Exigent Health and Safety (EHS) observed deficiencies continues to be required per MF and PH protocols. The safety of the residents is of utmost importance.</p> <p>If a resident refuses entry due to COVID-19 concerns it should be documented on the EHS Mitigation Certification.</p>
27. Will uploaded inspections be reviewed?	<p>Yes. Normal procedures will be followed to ensure the quality of inspections.</p>
28. What happens if an inspection does not meet sample size after exhausting all alternate units?	<p>Any inspection that falls into this category will be analyzed by REAC's Research and Development division to determine if the inspection results are representative of the physical condition of the property.</p>
29. Will an inspection be reviewed if all inspectable areas are not able to be inspected?	<p>Yes. However, if an inspection score is not able to be calculated, the inspection will be rescheduled to a later time taking into consideration the information collected during the inspection and COVID-19 risk criteria.</p>
30. Will my inspection for a non-insured or insured MF property be scored?	<p>Yes. There is no waiver from inspection scores for MF properties. If a property is in a low risk county and is inspected, a score will be issued.</p>

<p>31. Will my inspection for a PH property be scored?</p>	<p>When FY2021 assessments resume, inspections will be released and scored, and a PHAS score and designation will be released. Inspections for FY 2021 will be scheduled in accordance with the low-risk criteria listed previously.</p> <p>For further information please refer to the PIH notice at: https://www.hud.gov/sites/dfiles/OCHCO/documents/2020-13pihn.pdf.</p>
<p>32. If I receive a score on my inspection results may I file an appeal (technical review or database adjustment)?</p>	<p>Yes. You may either mail it per normal procedures or email the appeal request and all supporting documentation to REAC_TAC@hud.gov.</p> <p>For information on the appeal process, please visit: https://www.hud.gov/program_offices/public_indian_housing/react/products/pass/pass_guideandrule</p>
<p>33. Can I file an appeal (technical review or database adjustment) if my inspection results are not scored and are for information only?</p>	<p>No. In accordance with the regulations, an appeal must result in a significant change in the score. If there is no score issued, an appeal will not be considered.</p> <p>For information on the appeal process, please visit: https://www.hud.gov/program_offices/public_indian_housing/react/products/pass/pass_guideandrule</p>
<p>34. What if I cannot obtain all documentation within the regulatory deadlines?</p>	<p>If documentation cannot be obtained due to closures and/or limited operations during COVID-19, please let REAC know the circumstances and provide any relevant information. REAC will review the circumstances on a case-by-case basis.</p>

ANSWERS FOR PUBLIC HOUSING (PH) PROPERTIES

35. If a property was awarded a CHAP, will the property be inspected?	A Commitment to enter a Housing Assistance Payment (CHAP) does not relieve a property from a UPCS inspection. As long as that property is under the Annual Contributions Contract (ACC) and residents are living there, the property is subject to inspection in accordance with the PHAS rule (24 CFR 902.13). For properties with a CHAP, the resulting score is waived in accordance with the Rental Assistance Demonstration (RAD) guidance.
36. Our PHA was designated Troubled due to our financial score, but our physical score was satisfactory. Is it necessary to have inspections to have a new PHAS score published?	PIH Notice 2020-05 does not provide for a modification to PHAS scoring; therefore, PHAs that request a new PHAS score for FY2020 will be assessed per the regulation.
37. How do I request an inspection and PHAS score?	Please email PHAS@hud.gov with the request.
38. Is there an extension to the timeframe for filing a PHAS appeal?	Yes. REAC will extend the deadline for PHAS appeals. REAC will accept appeals within sixty days of resuming normal operations. Appeals received after the sixty-day timeframe will not be considered.
39. If I request a PHAS score will it only be for FY2020?	The FY 2020 score will be released as well as any prior fiscal year scores that were pending awaiting inspections to be completed. In the event a PHA requests a new assessment, inspections will be completed; thus allowing the prior fiscal year scores to be completed.

ANSWERS FOR HOUSING FINANCE AGENCIES (HFA) AND SERVICING MORTGAGEES (SM)

<p>40. How should Housing Finance Agencies (HFAs) that conduct their own SM inspections proceed?</p>	<p>HFAs are required to follow REAC’s COVID-19 risk analysis when scheduling inspections. HFAs may begin inspecting properties in low-risk counties on October 5, 2020.</p> <p>Prior to an inspector travelling for a scheduled inspection, the low-risk criteria must be reviewed to verify the county is has been low-risk for six weeks.</p> <p>Please refer to REAC’s COVID-19 Criticality data available at - https://www.hud.gov/program_offices/public_indian_housing/react</p>
<p>41. How should SM inspections (insured MF) proceed?</p>	<p>SMs are required to follow REAC’s COVID-19 risk analysis when scheduling inspections. SM Master Schedulers may schedule properties in low-risk counties for inspections beginning on October 5, 2020.</p> <p>Prior to an inspector travelling for a scheduled inspection, the low-risk criteria must be reviewed to verify the county is has been low-risk for six weeks.</p> <p>Please refer to REAC’s COVID-19 Criticality data available at - https://www.hud.gov/program_offices/public_indian_housing/react</p>
<p>42. Will my inspection for an insured MF property be scored?</p>	<p>Yes. There is no waiver from inspection scores for MF properties. If a property is in a low risk county and is inspected, a score will be issued.</p>

ANSWERS FOR CERTIFIED UPCS INSPECTORS

43. My ID badge is expiring soon, how do I get a new badge?	Please email your request for a new badge to the Inspector Administration (IA) mailbox - REACInspectorAdmin@hud.gov. A team member from IA will provide additional instructions for obtaining a new ID badge.
44. Will I be penalized for not having liability insurance during REAC's suspension of UPCS inspections?	No. However, it is recommended that inspectors renew insurance policies and upload the certificate in Secure Systems at least two weeks prior to resuming inspection activities. This will reduce delays and cancellations.
45. As a result of the suspension of inspections during the pandemic, I did not meet the 25 minimum inspections required. Will I be decertified?	No. As a result of COVID-19, the annual 25 minimum requirements will be waived. A new reporting period will begin once REAC resumes operations; meaning that 25 successful inspections must be completed within one year of that date to maintain UPCS certification.
46. What do I need to do to start the re-PIV process?	If an inspector's Personal Identity Verification (PIV) card is expiring, a team member from IA will contact an inspector before the expiration date to begin the re-PIV process.
47. Do I have to submit fingerprints for the re-PIV?	No. New fingerprints are not required for the re-PIV.

<p>48. Can I conduct inspections during the re-PIV process?</p>	<p>If the PIV has expired the inspector will not be allowed to conduct inspections until a new PIV approval is received.</p> <p>If the current PIV is still valid an inspector may continue to conduct inspections.</p> <p>If the current PIV expires while the inspector is completing the re-PIV process, the inspector will not be allowed to complete inspections until the new PIV approval is received.</p>
<p>49. Are additional “Dine and Learn” sessions planned?</p>	<p>Yes. Additional topics are scheduled for the rest of the calendar year. Visit our training website for those sessions and look for updates as we add 2021 training.</p> <p>https://www.hud.gov/program_offices/public_indian_housing/reac/products/pass/qa/insp-cert</p>

ANSWERS ABOUT UPCS TRAINING FOR PROSPECTIVE INSPECTORS

50. Will UPCS certification training be offered?	Yes. REAC will continue to offer UPCS certification training including the online Learning Module System (LMS), classroom, field training, and field examination.
51. Where can I find the UPCS training schedule and how do I register?	Please visit our website for the schedule and registration instructions: https://www.hud.gov/program_offices/public_indian_housing/reac/products/pass/qa/insp-cert
52. Is the on-line portion currently available?	Yes. Inspector candidates may begin the on-line training at any time.
53. How will the classroom portion of the training be delivered?	We are planning to offer the classroom training virtually. Please check our website for details and updates. https://www.hud.gov/program_offices/public_indian_housing/reac/products/pass/qa/insp-cert
54. Will there be any changes to the field training and exam?	No. Phase II field training and the examination process will remain unchanged.
55. Will LMS be available for inspector-candidates that have already passed the on-line and classroom portions?	Yes. If Inspector-candidates that have passed the online and classroom portions of the training would like to use the LMS for review prior to scheduling their Phase II field training and examination, please contact us at OnlineTrainingRegistration@hud.gov to request access.

56. When can I schedule my Phase II field training and exam?	There is currently a backlog of requests. REAC is working to accommodate and schedule inspector candidates for field training and examination as early as possible.
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Please note that the contents of this document, except when based on statutory or regulatory authority or law, do not have the force and effect of law, and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.