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INTRODUCTION

When performing inspections using the U.S. Department of Housing and Urban Development (HUD) Uniform Physical Condition Standards (UPCS) protocol it is the inspector's responsibility to ensure that they have the most up-to-date information available. This Bulletin applies to all physical inspections conducted using the HUD UPCS protocol.

It incorporates all previous guidance that HUD has given on a number of 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.

This edition of the Bulletin supersedes all previous editions and separate guidance. It is the inspector's responsibility to apply this guidance, as well as any other guidance issued by the Department 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.

Updates to the information in this Bulletin, as well as other information of which you need to be aware, can be found at <http://www.hud.gov/offices/reac/products/prodpass.cfm>.

Information on REAC's Quality Assurance program and frequently asked questions about the UPCS protocol can be found at <http://www.hud.gov/offices/reac/products/pass/qa.cfm>.

PART I: BUILDINGS, UNITS & GENERAL INFORMATION

DEFINITIONS

A. All-Inclusive List

A list of all the occupied, vacant and non-revenue units in each building of the property. Only the altered units, commonly known as permanent off-line units (see page 12) 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 as long as it includes all occupied and vacant units/buildings.

B. Commercial or Leased Space

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 (i.e. ovens, freezers, shelves, etc.). Regardless of ownership, all Health and Safety deficiencies and exigent items must be recorded in the appropriate Common Area, Health and Safety.

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. IA

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

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 property ID that is always 6 or fewer integers in length.

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.

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. Cancellation

1. Inspector: If an inspector must cancel an inspection due to an unexpected emergency, severe weather advisory, or sickness, it is the inspector's responsibility to notify the REAC TAC immediately and secure a REAC TAC reference number for the subject cancellation.
2. POA: If a POA does not show up or cancels a scheduled inspection, the contract inspector or servicing mortgagee inspector must call REAC TAC, and secure a REAC TAC reference number for the subject cancellation.
3. Inspectors must reschedule any inspection in which residents have not been notified, unless receiving permission to proceed with the inspection from REAC TAC.

B. 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. 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 Property Information Comments field regarding resident population for elderly only. For the purpose of determining whether the LBP disclosure form and inspection report is applicable, the inspector must use the building construction year 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."

C. Conducting Inspections

1. All inspectors are required to conduct a REAC inspection by following the same protocol and guidance, and adhering to the same code of conduct. This includes:
 - a. Inspectors must inspect all five inspectable areas for each property. (Site, Building Exterior, Building Systems, Common Area and Unit.)
 - b. 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 and structures will be recorded as Site, Health and Safety, Hazards, Other. These deficiencies need to be included on the EH&S form.
 - c. Inspectors must download the inspection prior to arriving at the property.
 - d. Inspectors must use the most current version of the Data Collection Device (DCD) software, and be proficient in the use of the software.
 - e. Only the inspector of record can conduct the REAC inspection. (This includes the observation, recording and calling out of deficiencies.)
 - f. Inspectors must accurately record the property profile in the data collection device before sample generation.

- g. Inspectors must properly identify and record all observations at the time they are observed as either No Observed Deficiency (NOD), Observed Deficiency (OD), or Not Applicable (NA.)
- h. Inspectors must properly categorize all deficiencies as Level 1, Level 2 or Level 3.
- i. The inspector must complete inspecting a unit before moving on to another unit. In addition, each inspectable building and site area must be recorded in the UPCS software as the inspection of that area is completed.
- j. All deficiencies must be recorded on the DCD at the time they are observed. 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 and/or building and the property.
- k. The inspection must be complete before leaving the property. Use the “Check/Prepare/Import” tab before leaving the property. If the “Check/Prepare/Import” function is executed after leaving the property and missing information is discovered, the inspector must return to the property to complete the inspection.
- l. 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.
- m. No specialized equipment other than a DCD is required to conduct a REAC inspection. Inspectors are required to arrive on site prepared to inspect all inspectable items and be able to accurately determine door and hallway widths for FHEO surveys, and inspect all applicable areas, including areas with no lighting, without assistance from property representatives, except as stated below. This includes, but is not limited to, ALL doors, ALL windows, ALL faucets, and ALL stoves/ovens. Testing is required for ALL smoke detectors and emergency lighting including those that are positioned over 8 feet in height above the floor wherever they are located, including cathedral or vaulted ceilings. The property representative is to provide access and perform testing in the visual presence of the inspector for smoke detectors and all inspectable items over 8 feet in height above the floor. Smoke detectors or any inspectable items over 8 feet in height above the floor not tested must be recorded as OD.
- n. While conducting an inspection an inspector is not to open closed doors within a unit. The resident, if present, or property representative is responsible to provide access.
- o. A property representative must accompany an inspector throughout the entire inspection.
 - i. 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.
 - ii. 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.
 - iii. If a property representative does not 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.
- p. An inspector is to inspect no more than the total number of sample units required 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.
- q. 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.
- r. Prior to or during the course of 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.
- s. To maintain statistical validity, it is important to select the sample units and alternates in the order in which they are displayed in the “sample units” field. The order of selection within the UPCS software is critical. Once the units are properly selected, the order of inspection may be any order the inspector chooses to facilitate the inspection.

- t. The following activities are among those that may be cause for an inspector's immediate de-certification:
 - i. Purposeful violations and/or omissions of the inspection protocol.
 - ii. Carrying a firearm onto a property.
 - iii. Theft or intentional property damage when at a property.
 - iv. Fraudulent activity associated with an inspection.
 - v. Other unprofessional conduct.
 - vi. Threatened or actual violence against a person while conducting an inspection.
 - vii. Sexual or other harassment when at a property.
 - viii. Canceling an inspection because HUD is performing a Quality Assurance Review of the inspector.
 - ix. Being required to register as a sex offender.
- u. Inspectors must maintain professional conduct and demeanor at all times during the inspection and during all other interactions with the residents, inspection participants, property representatives, etc.
- v. Inspectors may not solicit or sell inspection services during the course of the inspection process.
- w. An inspector may not provide training or consulting services to any property or property owner whose property the inspector has inspected for a period of 12 months from the date of the inspection or any subsequent reinspection.
- x. The inspector must display the HUD-issued photo identification badge during the entire inspection. Defer questions from the residents regarding the property to the property representative. Do not make promises or representations that items will be repaired based on inspection results. Do not offer an opinion as to the quality of the property. Do not disclose any information to a third party about the inspection results. At all times defer to the property owner or representative.
- y. 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.
- z. 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.

D. Duplication of Deficiencies

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

E. 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.

F. Observed Deficiencies

1. Inspectors are required to call out all observed deficiencies recorded, the location and level of severity, to the property representative during the inspection. If the property representative becomes argumentative regarding deficiencies during the course of the inspection, the inspector may complete the inspection without calling out the remainder of the deficiencies.

G. Occupancy Percentage for Multifamily Housing/Office of Healthcare Program Properties

1. The occupancy percentage must be recorded by the inspectors for all Multifamily Housing and Office of Healthcare Program properties prior to sample generation. Occupancy percentage is calculated by dividing the total number of occupied units by the total number of all units and then multiplying the result by 100.
2. Enter this information in the Comments field (the first three spaces) of the Property Information Tab as an integer with the "%" sign with no spaces between them (e.g. 87%). Any Multifamily Housing or Office of Healthcare Program property inspection that is uploaded without the occupancy percentage will be rejected.

H. 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.
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.

I. 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, Inspector Administration Notice 2006-01, and subsequent updates.

J. Property Profile Verification

1. While on-site and prior to generating the inspection sample, an inspector must visually verify the building count and type and unit count and confirm participant, certificate, area measures and other building/unit information with the property representative. Adding and editing of the information, if necessary, is done at that time.
2. Inspection data discovered to be in error during the course of the inspection may be edited as necessary with the exception of the building and/or unit count. 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. (See discussion of Visual Verification on page 8.)
3. If an inspector receives new information from the REAC TAC on a profile change, the inspector must make the necessary correction in accordance with the UPCS inspection protocol and provide a clear

comment explaining the change in the Building/Unit Information screen associated with the affected building in the building's Comment field. The inspector should record the REAC TAC reference number in the Property Information screen Comment field.

4. All building data must be correct. If the unit/building count is not correct, the inspector's performance will be rated as "Outside Standard" during a CQA or LQA review.
5. Each building must have a unique address.

K. Participants

1. Participants are the property contacts and must be identified by name, role, organization (when applicable), street, e-mail address and phone/fax numbers. At least three participants must be provided. For Public Housing properties one of the participants must be the "Owner/PHA." For Multifamily Housing and Office of Healthcare Program properties, two of the participants must be the "Owner" and "Management Agent." One of the participants listed must be someone who actively participates in the inspection process.

L. Rescheduled/Unsuccessful Inspections

1. Inspections are to be conducted at the scheduled time and date. PHA staff, multifamily owners/agents and QA inspectors plan their calendars around that commitment.
2. If the inspector needs to reschedule an inspection for any reason, the inspector must do so at the earliest opportunity possible. This allows the other participants in the inspection to adjust their schedules accordingly.
3. Inspections should not be cancelled within 72 hours if at all possible.
4. When it is within 72 hours of the inspection start time, the inspection may only be rescheduled for acceptable reasons. Acceptable reasons include severe weather conditions, incapacitating illness, or other emergencies of a rare and unusual nature.
5. If the inspector needs to cancel an inspection within 72 hours of the scheduled start time, the inspector must notify the property representative immediately. The inspector must also call the REAC TAC and secure a REAC TAC reference number.
6. Excessive cancellations and rescheduling by inspectors will be subject to Inspector Administration (IA) review.
7. If a property representative is not available to accompany the inspector for a confirmed inspection date or wishes to reschedule an inspection, the inspector must secure a REAC TAC reference number.
8. If the residents have not been notified of a confirmed inspection, the inspector must report this and secure a REAC TAC reference number. The inspection will either need to be rescheduled or reported as unsuccessful if the property representative cannot provide the appropriate access.

M. 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 (i.e. scheduled breaks, lunch time, 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.
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. Inspection of site and building exteriors must be concluded during daylight hours.

4. Property staff arrange their schedules to be available for the inspection. Therefore, it is critical that the inspector arrive on time and is ready to begin the inspection process.
5. 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 also notify REAC TAC and secure a REAC TAC reference number. 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.
6. 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. Additionally, the inspector cannot begin another inspection until the first inspection is completed.
 - 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.

N. Severe Weather Policy

1. Inspectors are not to inspect a property if a "severe weather advisory" is in effect and must notify the REAC TAC immediately and secure a REAC TAC reference number. A severe weather advisory includes, but is not limited to, hurricanes, tornadoes, thunderstorms, hail or any other adverse weather condition that would likely endanger the safety of the participants. This also includes a snowstorm in which a severe weather advisory has been issued.

O. Snow Policy

1. In the absence of a severe weather advisory, 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 comments field for the property and for each affected building/unit, provide a comment indicating which items were hidden by snow.

P. Systems Designed for Off-site Notification/Monitoring

1. If the property can provide current (within one year) documentation 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".

Q. 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.

R. 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.

S. Visual Verification

1. The inspector must walk or drive around the property to get into a position to visually verify the entire property for the existence of all buildings and building types with the property representative prior to sample generation.
2. In the case of "single family scattered sites," visual verification with the property representative is not required prior to sample generation, unless any one or more of the buildings has more than four units.
 - a. When no building has more than four units, the inspector may establish the building/unit profile utilizing data provided by the property representative, generate the sample, and start the inspection. Building/unit profile information must be visually verified as the inspection progresses. The inspector is still responsible for visiting all building locations in the profile to verify all buildings and units, including those not in the sample and must inspect each location for Site and Health and Safety deficiencies.
 - b. If any one building contains more than four HUD assisted or insured units, then all of the buildings in the scattered site must be visually verified prior to generating the inspection sample.
 - c. If a common building (a building with no units) is discovered in a "single family scattered site" property inspection, that was not included in the building/unit profile, the inspector is to add the building; change the reason uninspectable field to "None Entered," provide an explanation in the building comments field, and inspect that building. If an occupied or vacant residential building is discovered that was not included in the building/unit profile, add the building and provide an explanation in the building comments field. The inspector must notify REAC TAC to secure a REAC TAC reference number and report any change in the property profile.
3. Only properties that are to be inspected on the same day, by the same inspector, may be visually verified at the same time.

T. Work in Progress

1. If buildings or units are vacant (temporarily offline) 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 13 for an exception).
2. If buildings or units are occupied but rehabilitation work is in progress, the inspector must inspect the buildings or units, recording all deficiencies in accordance with the UPCS protocol.

BUILDINGS & UNITS

A. Building

1. An individual building is any structure that has a contiguous roofline, a permanent foundation, is enclosed on all sides and has at least one utility servicing it such as electric, gas, water, or sewer.
2. 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.

B. Building Type

1. The UPCS software lists the following building types:
 - a. Common Building: A detached non-residential structure.
 - b. Duplex: A detached residential structure consisting of two units.
 - c. Low-Rise/Garden Apartment: A multi-unit residential structure consisting of two and one-half floors or less with a common hall entrance.
 - d. Mid/High-Rise Apartment: A multi-unit residential structure consisting of three or more floors with or without elevators.
 - e. Row/Town Houses: 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: 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 “Single Family.”
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. (e.g. If a building is a duplex, but only contains one HUD assisted unit, the building type is still “duplex,” NOT “single family”.)

C. Scattered Site

1. A Scattered Site can be defined as a property with multiple locations around a town, city, county, or state. In order 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. For purposes of defining scattered sites only:
 - a. Single Family Building
 - i. For purposes of determining a single family scattered site only, a single family scattered site building is a building comprised of one to four HUD assisted or insured dwelling units. For example, a row/townhouse building, which contains one to four HUD assisted or insured units, is a single family building. Do not confuse “single family building” with the UPCS software building type definition for “Single Family.”
 - ii. If all buildings are single family buildings (four or less units per building), the inspector is not required to visually verify the buildings prior to sample generation.

b. Multifamily Building:

- i. For purposes of determining a multifamily scattered site, a multifamily building is comprised of five or more HUD assisted or insured dwelling units. For example, a row/townhouse building, which contains five or more HUD assisted or insured units, is a multifamily building. Do not confuse “multifamily building” with HUD’s Department of Multifamily Housing.
- ii. If any one building has five or more units per building, the inspector is required to visually verify all the buildings associated with the inspection prior to sample generation, (e.g. If only one of 20 buildings contains five or more units, then all 20 buildings must be visually verified prior to sample generation).

D. 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 free-standing 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 free-standing 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, Other Hazard.

E. Buildings Offline

1. During an inspection, the inspector may find that some buildings are off-line.
 - a. Permanent Off-Line Building: These are buildings that the property has taken off-line permanently and are no longer included in the rent roll reporting (e.g. a building scheduled for demolition. These buildings are normally boarded-up and isolated by fencing/wires). Do not delete them from the profile. Inspectors are to record these buildings as “uninspectable” with the appropriate reason, prior to generating sample.
 - b. Temporary Off-Line Building: 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 selected as a sample building, record the building as “uninspectable” with the appropriate reason after visual verification and select the next alternate building in the listing. If the inspector cannot meet the building/unit sample requirements, the inspector must secure a REAC TAC reference number before uploading the completed inspection.

F. Clarification For Offline 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 they are 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 have been taken out of rent roll or other HA rental records.
- b. Temporary Off-Line Buildings/Units: The PHA has set these aside and they are undergoing or awaiting modernization or HOPE VI funding for 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 they must be vacant. These buildings/units are to be included in the rent roll or some other comparable property management 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” after the sample has been generated.
- c. Vacant Buildings/Units: Typically, these are the buildings/units that are vacant in the normal course of operations due to turnover, legal actions, fire damage, etc. For Vacant Buildings, reference “Temporary Off-Line Buildings” above. For Vacant Units, reference “Vacant Units” under “Unit Types” on page 12 and the “Vacant Unit Policy” on page 13.

2. Multifamily Housing:

- a. REAC inspections typically occur before or after a property undergoes extensive rehabilitation. REAC inspections should not be scheduled and conducted for properties that have extensive on-going modernization/rehabilitation activities currently in progress.
- b. 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.”
- c. Temporary Off-Line Buildings/Units: In Multifamily Housing, they 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:
 - i. 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 approving and identifying the buildings/units to be taken off-line.
 - ii. The inspector must reference this letter in the property comment field in the DCD.
 - iii. Buildings/units that are designated and approved as temporary off-line must remain in the building/unit count and the inspector shall include them in the property profile when generating the sample.
 - iv. If a building that is designated as temporary off-line is selected as a part of the sample, the inspector must visually verify that it is off-line and select an alternate.

- v. If a dwelling unit that is designated as temporary off-line is selected as a part of the sample, the inspector must visually verify that it is off-line and select an alternate.
- vi. Though not to be inspected, the inspector must record any observable health and safety hazards that an off-line building or unit poses to other residents.

G. Units

1. **Non-Revenue Units** (also known as site manager or staff units): These are units that typically do not produce revenue for the property and are usually occupied by property staff and may not be shown on the rent roll. For PIH properties and MF/OHP FHA-insured and/or HUD-held loan properties, they must be included in the building's unit count and on the all-inclusive list prior to generating the sample. If selected as a sample unit, they must be inspected as per the protocol.
2. **Nursing and Group Home Units** (also known as client rooms): For nursing homes, group homes, and other assisted living facilities, any room with a bed, or beds, is considered a "client room." Inspectors must change the number of units in the DCD to reflect client rooms and generate a sample based on the number of client rooms (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 (apartment-type) dwelling units, the total number of units used to generate the sample will include both.
3. **Section 8 Units**: Some Multifamily Housing properties have HUD assisted Section 8 units (project-based). 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. However, all other inspectable areas including common buildings used by residents and buildings with common areas that have Section 8 units must be inspected in accordance with the protocol.

H. Unit Types

1. There are three types of units that are commonly observed within a building:
 - a. **Occupied Units**: Units presently occupied that must be included in building's unit count. This may include non-revenue units on the property that are normally occupied by property staff (i.e. Site manager, Maintenance staff, etc.) as part of their compensation (rent free).
 - b. **Vacant Units**: These are units that have no active lease. However, this will also include temporarily offline units such as fire damaged units and units undergoing rehabilitation and must be included in the building's unit count.
 - c. **Altered Units**: Which may be referred to as permanently off-line units which are discussed above. Units that have been converted from a dwelling unit use to a non-dwelling unit use (e.g. office/community spaces, police service spaces). These units are to be removed from the building's 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 common space. 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.

I. Vacant Unit Policy

1. Multifamily Housing: For all Multifamily Housing properties, vacant units that are included in the random sample will be inspected only at a property that has a vacancy rate of 15% or more. Failure to inspect vacant units at these properties means the inspection will be declared 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 tab. The unit inspectable status of "None Entered" should remain unchanged. The inspector should un-check the "Occupied" box and enter an appropriate comment in that unit's comment field (e.g. Vacant unit inspected under the MF 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. If no sample units are available in a sample building, the inspector must select an alternate unit of a similar building type. If there are no alternate units available of a similar building type, then the inspector must select an alternate unit from the next building type. If there are no alternate units available for selection, the inspector must call the REAC TAC to secure a REAC TAC reference number before proceeding.

PART II: DEFINITION CLARIFICATIONS

DOORS

A. Doors (Apply to all inspectable areas.)

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 or not the sample building has sample units to be inspected. 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. (Doors, Building Exterior would be marked as "NA".)
3. Locks are not required on common area doors. If a lock was installed it must be inspected to ensure that it functions as designed with 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 but must function as designed.
4. The deficiency Deteriorated/Missing Caulking Seals applies only to entry doors. Entry doors not designed with seals are not required by the UPCS protocol to have seals. When recording seal defects, inspectors must use their own professional experience to observe and determine whether or not 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. 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 Doors, Damaged Frames/Threshold/Lintels/Trim, Level 3, with the appropriate comment.
 - b. Insulated glass units and thermal pane doors that show evidence of seal leakage, such as condensation or discoloration between glass panes, must be recorded as Doors, Deteriorated/Missing Caulking Seals, Level 3, with the appropriate comment.
5. 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.
- 6. Holes left in doors from the removal of hardware must be evaluated as door surface damage.
- 7. Significant peeling/cracking/no paint, rust which affects the integrity of the door surface, or broken/missing glass is applicable only to Level 3 of the damaged surface deficiency.
- 8. The deficiency Damaged/Missing Screen/Storm/Security Door, Level 1, applies to missing as well as damaged screen and storm doors.
- 9. A door missing from its jamb or frame is recorded as a Missing Door regardless of whether or not the door is in the immediate area.
- 10. Double doors that serve one door entrance are considered to be one door. Record as one missing door if one or both are missing.
- 11. 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.
- 12. If a majority of doors within a unit are painted or varnished, then any unpainted or unvarnished door must be recorded as a Damaged Surface, Holes/Paint/Rusting/Glass, Level 3, deficiency. If a majority of the doors are unpainted or unvarnished, do not record a deficiency.
- 13. A stick is an acceptable alternative to an inoperable lock only for a sliding glass door. If the stick is not installed it must be in the vicinity of the door and must be installed/tested by the inspector to ensure that the door can be secured.
- 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. Inspectors must exercise "professional common sense."

WINDOWS

A. Windows (Apply to all inspectable areas.)

1. Sample buildings may be generated that contain no sample units. Therefore, the deficiencies, Broken/Missing/Cracked Panes, Missing/Deteriorated Caulking/Glazing Compound, and Security Bars Prevent Egress may have to be recorded in different inspectable areas depending on whether or not the sample building has sample units to be inspected. 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. The exception to this is window screen-related deficiencies observed in sample units and common areas. These must be recorded in Building Exterior because there is no place in Unit or Common Areas to record window screen-related deficiencies. Health and Safety window deficiencies that are not observed in a sample unit should be recorded under Exterior, Health and Safety, Hazards, Other.
 - 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. Record all window deficiencies observed in common areas in the associated Common Area.
2. Insulated glass units and thermal pane windows that show evidence of seal leakage such as condensation or discoloration between glass panes must be recorded as Missing/Deteriorated Caulking/Seal, Level 3, with the appropriate comment.
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/Security Bars Prevent Egress must be recorded. However, a deficiency must not be recorded for windows that are not large enough or not otherwise designed for egress.
4. A hasp attached to moveable security bars is not a deficiency provided that the inspector can test the bars to evaluate proper operation. However, a lock on moveable security bars, requiring a key (special tool) to open, whether locked or unlocked at the time of inspection, must be recorded as a Security Bars Prevent Egress deficiency, when the window is the only 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.

B. Windows: Common Areas and Units

1. All windows in sample units and common areas must be inspected (tested) for correct operation.
2. A stick is an acceptable alternative to an inoperable lock for a window if it is observed in place or in the vicinity of the window. The inspector must test the window with the stick installed to ensure that the window can be secured.

3. The deficiency Inoperable/Not Lockable is broken into two parts: Inoperable addresses the operation of a window (i.e. cannot be opened or closed due to damage to the frame, faulty hardware, etc.); and Not Lockable addresses the lock only.
- a. Inoperable: All windows must operate as designed. Windows that do not operate as designed and there are no other operable windows in the same floor area, must be recorded as an Inoperable/Not Lockable, Level 3 deficiency, with the appropriate comment. Record an Inoperable/Not Lockable, Level 1 deficiency for all windows that do not operate as designed with other operable windows in the area.
 - i. 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 an Inoperable/Not Lockable, Level 3 deficiency, with a Health and Safety, Emergency/Fire Exits, Blocked/Unusable deficiency.
 - ii. 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 an Inoperable/Not Lockable, Level 3. Only record a Health and Safety, Emergency/Fire Exits, Blocked/Unusable deficiency if it also provides access to a fixed fire escape route (landing, ladder, roof, etc.).
 - b. Not Lockable: All windows that are accessible from the outside (e.g. ground level or by means of an exterior stairway) must be lockable. Record an Inoperable/Not Lockable, Level 3 deficiency if they cannot be locked. In addition, all other windows that are designed to lock must lock or an Inoperable/Not Lockable, Level 3 deficiency must be recorded. Windows, except those accessible from the outside, that are not designed to lock are not a deficiency.

ELECTRICAL

A. Electrical (Apply to all inspectable areas.)

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. 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 Hazards, Other for that building or under Site, Health and Safety, Hazards, Other, as appropriate. If the Health and Safety defect is Life Threatening, it will need to be 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.
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/Improper Storage.
6. 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 could be keys for locks, cutters, screwdrivers, etc. The inspector must exercise professional common sense in inspecting these boxes.
7. 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. This would be recorded at Building Exterior, Health and Safety, Electrical Hazards, 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.
8. An opening (gap) of more than ¼ inch between the breakers and the internal cover of an electrical panel is an electrical hazard. This deficiency is to be recorded under the applicable inspectable area (i.e. Site, Building Exterior, Building Systems, Common Areas or Unit), Health and Safety, Electrical Hazards, Exposed Wires/Open Panels.

B. Electrical: Systems

1. A missing elevator control panel cover must be recorded as Missing Covers 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 Covers, Level 3 deficiency. However, if the condition results in a life threatening situation, it will need to be recorded under Systems, Health and Safety, Electrical Hazards, Exposed Wires/Open Panels. Refer to the "Elevator Inspection Policy" on pages 23 and 24 prior to inspecting this equipment for deficiencies.

C. Electrical: Unit

1. 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.'"
2. 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. Deficiencies for inoperable AFCI circuit breakers are to be recorded under Unit, Electrical System, GFI Inoperable.

PROPERTY INSPECTABLE AREAS

SITE

A. Site General Information

1. If you are recording an inspectable item such as Grounds, Market Appeal, and Walkway/Steps as “NA”, you must enter a justifiable comment in the Property Information Comment field, even when no land owned by the property exists around a building (e.g. city property). If you fail to enter a justifiable comment, the inspection will be challenged by REAC.
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 will have to 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 in the pop-up “defective area” screen after the 5% threshold is reached. Reminder: Remove Level 2 checkmark if 5% threshold is not met.
5. All roadways and walkways that the property represents as being owned by the property need to be inspected. Roadways and walkways that the property represents as owned by a public authority (city, county, state, etc.) need not be inspected.
6. Regardless if the building is in the sample or not, the site must be inspected around every building, for both single and multifamily scattered sites (e.g. If 15 of 30 buildings are in the sample, the site around all 30 buildings must be physically inspected).

B. Fencing and Gates

1. Exterior fences, also known as perimeter fences, are found along the perimeter of the property. Interior fences are found within the property’s perimeter.
2. A security fence could be either an exterior or interior fence but its intended purpose is to provide safety and security for the property residents.
3. If a property has fencing along its perimeter as an exterior security fence, whether or not it is owned by the property, the fencing must be inspected for deficiencies.
4. A privacy fence that is used for privacy of an individual unit is considered as an interior fence.

C. Grounds

1. The deficiency Overgrown/Penetrating Vegetation addresses conditions that have an adverse effect on the physical condition of the property or negatively impact the use of the property by residents. Do not record a deficiency for vegetation 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.

D. Play Areas and Equipment

1. Inspectors are to inspect park benches located within a play area and record deficiencies as Damaged/Broken Equipment, as applicable. Benches not located within a play area are not inspected, except for Health and Safety issues.

E. Walkway/Steps

1. An inspector must record damage to a concrete slab porch or entry stoop in Walkways/Steps, as applicable.

BUILDING EXTERIOR

A. Doors

1. Refer to the “Doors” section on pages 14 and 15.

B. Electrical System

1. Refer to the “Electrical” section on page 18.

C. FHEO - 32” Wide Main Entrance

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

D. FHEO - Obstructed or Missing Accessibility Route to Main Floor Entrance

1. 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 FHEO – Obstructed or Missing Accessibility Route, Main Floor Entrance.
2. Accessible routes include a level surface to the door, ramps where necessary, and sufficient (36 inch) width.

E. Fire Escapes/Fire Exits

1. All buildings must have acceptable fire exits. Therefore, inspectors must never record Fire Escapes as “NA” under Building Exterior.
2. 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 Cracks/Gaps is applicable to both foundation walls and floors (structure slabs).
2. For Foundation, Spalling/Exposed Rebar 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.

G. Ground Fault Interrupter (GFI)

1. 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, Other when observed unless that GFI can be associated with a specific inspectable area. When identified with a specific inspectable area, then any deficiency found is to be cited in that specific area.

H. Lighting

1. An inspector must inspect all broken or missing lighting fixtures or bulbs on the building's exterior and record deficiencies in Broken Fixtures/Bulbs as applicable. Site lighting, not attached to a building, must be assigned to nearest building and evaluated as a part of that building's exterior lighting. An exception 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.
2. The levels of the deficiency Missing/Damaged Shingles apply to both missing and damaged shingles.

J. Walls

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 Missing Pieces/Holes/Spalling, as applicable.

K. Windows

1. Refer to the "Windows" section on pages 16 and 17.

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) (e.g. HVAC, Fire Protection, etc.) is located inside a unit and is not visible to the inspector, the protocol requires the inspector to record "NOD" for the item and make a comment in the Building Comments field identifying that the item could not be inspected because it was located 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 hot water tank located in a single common area is to be evaluated under Systems, Domestic Water.

C. Electrical System

1. Refer to the "Electrical" section on page 18.

D. Elevators

1. Elevator Inspection Policy: This requirement is to be determined during 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. If a door to the room is not secured, record this condition under Common Area, Health and Safety, Hazards, Other 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 under Closet/Utility/Mechanical.
 - 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 of the following conditions:
 - i. Elevator equipment must be:
 1. Located on a suitable balcony, gallery, or platform that excludes unqualified persons or is at least 8 feet above the floor.
 2. Protected by permanent, substantial partitions or fencing or screens such that access is limited to qualified personnel only.
 - ii. The property must provide a qualified person to grant access to the room.
 - iii. The property must provide a written waiver/variance from the governing authority that permits access without a qualified person.
 - c. A qualified person means someone who has the skills and knowledge related to the construction and operation of electrical 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.
 - d. The property is to confirm the qualifications of the escort.
 - e. Governing authority is that which controls the inspection/certification of elevators for that location.

- f. After arrival on-site for the inspection, if these rooms cannot be accessed as specified, 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.
- g. All other aspects of operation, certificates, and Health and Safety deficiencies relevant to the elevators are to be reviewed or inspected per UPCS protocol.

E. Emergency Power

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

F. 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.
- 2. Fire Extinguishers:
 - a. All fire extinguishers observed must be inspected, whether resident owned or property owned.
 - b. Buildings must meet the requirements of local and state fire and safety codes. As a result, some buildings have fire extinguishers, while others do not. If fire extinguishers are not present and there is no evidence, such as mounting brackets or fire cabinets, that 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 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)

- i. 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 the purpose of determining the proportionality for Systems, Fire Protection, Missing/Damaged/Expired Extinguishers, 66% of the extinguishers are deficient and it is a Level 3 deficiency.
- ii. An 80 unit, mid/high rise building has ten common area extinguishers, plus 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, Missing/Damaged/Expired Extinguishers.
- 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 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 those that are being stored in a specifically designated area with the intention of being disposed of or serviced at a later date. (Typically found in maintenance areas in various quantities.)

f. Applicability of the definition for Missing/Damaged/Expired Extinguishers:

- i. 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.
- ii. 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.
- iii. Level 3: Applies to an individual building regardless of the number of fire control systems. Record a deficiency if more than 10% of the extinguishers are missing, damaged, or expired.

Or

- iv. 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. UPCS protocol requires inspection of existing fire extinguishers. This consists of visually checking the gauge and the certificate attached on the unit of a re-chargeable extinguisher. This requirement is intended only for re-chargeable fire extinguishers. However, for properties using disposable (or non-rechargeable) fire extinguishers, the evaluation consists primarily of a visual check of the gauge, which must clearly indicate that the fire extinguisher is adequately charged. (i.e. The arrow in the gauge is pointing within the green area and is not under or over charged.)

3. Fire Hoses:

- a. When inspecting fire hoses, use the inspectable defect, Missing/Damaged Expired Extinguishers to record deficiencies by substituting fire hoses for fire extinguishers within the levels of the deficiency. The UPCS protocol does not require fire hoses to have inspection tags. Do not record a deficiency for fire hoses with expired or missing tags.

G. HVAC

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

COMMON AREAS

A. Common Areas General Information

1. The property representative must provide access to all building common spaces. Inspectors are not required to move items to gain access to an inspectable area.
2. The property representative must provide the inspector with access to physically inspect for correct operation all inspectable items, such as doors, windows, light switches, etc. If the inspector cannot access 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.

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 are to be recorded under Building Exterior, Foundations.

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

D. Doors

1. Refer to the "Doors" section on pages 14 and 15.

E. Electrical System

1. Refer to the "Electrical" section on page 18.

F. Exit Signs

1. If there has never been an exit sign, HUD does not require one to be installed. (Missing exit signs are not a deficiency if there is no evidence that there ever was one.)
2. 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 Health and Safety, Missing Exit Signs.

G. FHEO - 36" 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. This inspectable item applies to all occupied buildings regardless of building type, that have areas outside of the building that are commonly used by all residents. Outside common areas include parking lots, freestanding or attached common buildings (e.g. laundry building), patios, play areas, etc.

I. Kitchen

1. 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 drawers Total Components: 8 drawers = 75% damaged = Level 3

Inspector shall therefore record a Level 3, with the appropriate comment.

2. Delaminating is to be recorded as cabinet damage when applicable. Surface chipping or finish deterioration is not a recordable defect.
3. The terms missing and/or damaged are interchangeable when applying deficiencies to cabinets.
4. Damage to laminated countertops is only recordable as a deficiency when the damage goes below the laminate and 20% or more of the countertop is affected.
5. An exhaust fan in a kitchen that has been intentionally blocked is a Range Hood/Exhaust Fans, Excessive Grease/Inoperable, Level 3 deficiency, unless there is an operable window in the kitchen.
6. Inspecting 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 Level 3 deficiency, inoperable, 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, and (3) call the REAC TAC and report that the POA refused to turn the range/stove/oven on and off, and (4) include the REAC TAC number in the comment section. Prior to the inspection remind the POA that before turning on any appliance, check for and remove all items that may be damaged from the top of burners and inside ovens.
7. On a gas stove, if a burner(s) is not functioning, the property representative must be given an opportunity to check the pilot light(s) and re-light it if it is out. If all burners are operable after re-lighting the pilot, record a Range/Stove - Missing/Damaged/Inoperable, Level 1 deficiency. If a burner(s) still does not function after re-lighting, record a Level 2 or Level 3 deficiency as applicable. If the property representative does not wish to check or light the pilot, record a Level 2 or Level 3 deficiency as applicable.
8. When burners have been removed from the stove for cleaning or repair, if the burners 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.

9. When control knobs have been removed from the stove, if the control knobs 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 Level 1 deficiency. (Except in those cases where it is clear that they have been removed to protect the safety of the resident (e.g. Alzheimer's patient)).

J. 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.

K. 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 deals with whether the fixture is broken. Bulbs are not addressed in the definition.
2. Fixture or lamp globes or bowls are not considered part of the lighting system. Do not record them as a deficiency as long as the light functions.

L. Pools and Related Structures

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

M. Patio/Porch/Balcony

1. Damage to a concrete slab porch or entry stoop must be recorded in Site, Walkways/Steps as applicable.

N. Storage

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

O. Trash Collection Areas

1. Inspectors must record any trash collection system component (e.g. chute, chute door, lock, counterweight, and compactor) that has failed as a Chutes - Damaged/Missing Components, Level 3 deficiency. Inspector must record any other deficiency observed in the trash collection room under Closet/Utility/Mechanical.

P. Walls

1. An inspector must evaluate Damaged/Deteriorated Trim on any one wall as a percentage of the total trim on that one wall surface. (Missing trim 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.

Q. Windows

1. Refer to the "Windows" section on pages 16 and 17.

UNIT

A. Unit General Information

1. Refrigerators, stoves, fire extinguishers, and window air conditioners owned by the resident must be inspected and deficiencies recorded as if the appliances are owned by the property.
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, such as windows, stoves/ovens, AC units, call-for-aids, light switches, etc. If the inspector can not access inspectable items, the inspector is to record these items as defective.
4. For client rooms, (group home, special needs, nursing home, etc.), 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, 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 and/or Bathroom 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 as a result of disconnected utilities, in accordance with the UPCS inspection protocol. The inspector is to indicate which type of utility is disconnected in the Unit Information Comment box.

B. Bathroom

1. All sinks, showers, and tubs must be inspected by operating the hot and cold water faucets or controls.
2. A missing or inoperable mechanical stopper (in both a tub or sink) shall be recorded as a Level 1.
3. Do not record a Ventilation/Exhaust System, Inoperable deficiency for bathrooms constructed without either an exhaust fan or a window.
4. If a roof exhaust fan that vents bathrooms in a high rise has failed, record a Building Systems, Exhaust System, Roof Exhaust Fans Inoperable, Level 3 deficiency for the roof exhaust fan, but do 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 (e.g. a bell sounds an alarm, a light is turned on, or off-site personnel are notified when the system is activated).
2. When recording an Inoperable, Level 3, deficiency and providing comments (e.g. coiled-up, not fully extended, more than "x" distance from the floor, taped to the wall, etc.), inspectors are also required to address the system functionality as supporting justification. Failure to provide the appropriate comments will result in the uploaded inspection being challenged by REAC.
3. 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 Inoperable, Level 3.

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

E. Doors

1. Refer to the “Doors” section on pages 14 and 15.

F. Electrical System

1. Refer to the “Electrical” section on page 18.

G. Floors

1. Stains on floor covering are only applicable to Level 1 of the Floor Covering Damage deficiency, 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.
3. Cracks on basement floors are to be recorded under Building Exterior, Foundations.

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

I. HVAC System

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

J. Kitchen

1. 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

Inspector shall therefore record a Level 3.

2. Delaminating is to be recorded as cabinet damage when applicable. Surface chipping or finish deterioration is not a recordable defect.
3. The terms missing and/or damaged are interchangeable when applying deficiencies to cabinets.
4. Damage to laminated countertops is only recordable as a deficiency when the damage goes below the laminate and 20% or more of the countertop is affected.
5. An exhaust fan in a kitchen that has been intentionally blocked is a Range Hood/Exhaust Fans, Excessive Grease/Inoperable, Level 3 deficiency, unless there is an operable window in the kitchen.
6. Inspecting 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 Level 3 deficiency, inoperable, 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) include the REAC TAC number in the comment section. Prior to the inspection remind the POA that before turning on any appliance, check for and remove all items that may be damaged from the top of burners and inside ovens.
7. On a gas stove, if a burner(s) is not functioning, the property representative must be given an opportunity to check the pilot light(s) and re-light it if it is out. If all burners are operable after re-lighting the pilot, record a Range/Stove – Missing/Damaged/Inoperable, Level 1 deficiency. If a burner(s) still does not function after re-lighting, record a Level 2 or Level 3 deficiency, as applicable. If the property representative does not wish to check or light the pilot, record a Level 2 or Level 3 deficiency, as applicable.
8. When burners have been removed from the stove for cleaning or repair; if the burners 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.
9. When control knobs have been removed from the stove, if the control knobs 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 Level 1 deficiency, except in those cases where it is clear that they have been removed to protect the safety of the resident (e.g. Alzheimer's patient).

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 or lamp globes or bowls are not considered part of the lighting system. Do not record them as a deficiency as long as the light functions.
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 to be considered as a separate room for light fixture assessments.

M. Outlets/Switches

1. The deficiency Missing pertains to both missing and/or damaged outlets and switches that do not function at all.

N. Patio/Porch/Balcony

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

O. Smoke Detector

1. Smoke detectors within a unit must be operable and located on each living level including the basement, but not the crawl spaces 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.

P. Walls

1. An inspector must evaluate Damaged/Deteriorated Trim on any one wall as a percentage of the total trim on that one wall surface. Missing trim 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.

Q. Windows

1. Refer to "Windows" section on pages 16 and 17.

HEALTH AND SAFETY (H&S)

When noting the location of a 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 or lower floors
 - a. The Blocked/Unusable deficiency is applicable to blocked or unusable emergency/fire exits on these floor areas (e.g. 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 the only window in a floor area (e.g. room, unit or building) is blocked by a window air conditioner, furniture, or any other obstruction including an inoperable window sash and the area has only one exit door, the inspector must record a Blocked/Unusable deficiency.
 - c. If a floor area has an obstructed window but has another 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 (e.g. room, unit or building) on the fourth or higher floors are required to have at least one unobstructed exit door (primary). However, if an area is designed to have more than one means of egress to a designed fire escape, such as a common area hallway or a window exit, then a Health & Safety deficiency exists.
3. The note in the Blocked/Unusable definition that states, "This does not apply to individual units," must be disregarded.
4. All blockage that limits a person's ability to exit a room in case of emergency is considered a deficiency. Professional common sense and inspector knowledge are to be applied.
5. 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 (i.e. family, elderly, handicapped), when making a determination of the applicability of this defect.

B. Common Area Doors – Blocked Fire Exits (double keyed deadbolts)

1. Double-sided keyed deadbolt locks are an EH&S deficiency when they serve as the entrance or exit points for buildings that contain residential units.

C. Unit Doors – Blocked Fire Exits (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 (primary) means of exit. A primary exit door is the main means of egress from a floor area (bedroom, kitchen, living, etc.)

D. Flammable Materials

1. Gasoline fueled power equipment with gasoline in the tank stored in a residential building's basement is an Improperly Stored deficiency.
2. Lawnmower/gasoline that is properly stored in a garage must not be recorded as a H&S deficiency.

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