



**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing**

Special Attention of:

Public Housing Agencies
Public Housing Hub Office Directors
Public Housing Program Center Directors
Regional Directors
Field Office Directors

Notice PIH 2005-4 (HA)

Issued: January 18, 2005

Expires: January 31, 2006

Cross Reference:

Subject: Exigent Health and Safety Deficiency Correction Certification – New Reporting Procedures

1. **Purpose.** This notice describes the new electronic exigent health and safety (EHS) system for public housing agencies (PHAs) and Public Housing Field Office staff. This notice explains how PHAs are to certify to the correction or abatement of the life-threatening (i.e., EHS) deficiencies observed during Uniform Physical Condition Standards (UPCS) inspections. It also outlines the procedures for Field Office staff to enter and record any follow-up activities that they have completed to ensure that EHS deficiencies have been corrected or abated.
2. **Applicability.** This notice is applicable to all PHAs and Public Housing Field Office staff. It describes procedures related to the EHS deficiencies observed in the UPCS inspections conducted in accordance with the Public Housing Assessment System (PHAS) regulation (24 CFR Part 902) and the UPCS regulation (24 CFR Part 5, Subpart G).
3. **Definition.**

EHS Deficiency. An EHS deficiency is a deficiency that threatens the life, health and/or safety of the residents. An EHS deficiency is observed in any one of the five inspectable areas of a property during a UPCS inspection. The EHS deficiencies by inspectable area are:

Site

Air Quality – Propane/Natural Gas/Methane Gas Detected
Electrical Hazards – Exposed Wires/Open Panels
Electrical Hazards – Water Leaks on/near Electrical Equipment

Building Exterior

Electrical Hazards – Exposed Wires/Open Panels
Electrical Hazards – Water Leaks on/near Electrical Equipment
Emergency Fire Exits – Emergency/Fire Exits Blocked/Unusable
Fire Escapes – Blocked Egress/Ladders

Fire Escapes – Visibly Missing Components

Building Systems

Air Quality – Propane/Natural Gas/Methane Gas Detected
Domestic Water – Misaligned Chimney/Ventilation System
Electrical System – Missing Breakers/Fuses
Electrical System – Missing Covers
Electrical Hazards – Exposed Wires/Open Panels
Electrical Hazards – Water Leaks on/near Electrical Equipment
Emergency Fire Exits – Emergency/Fire Exits Blocked/Unusable
Fire Protection – Missing/Damaged/Expired Extinguishers
HVAC – Misaligned Chimney/Ventilation System

Common Areas

Air Quality – Propane/Natural Gas/Methane Gas Detected
Electrical – Missing Breakers
Electrical – Missing Covers
Electrical Hazards – Exposed Wires/Open Panels
Electrical Hazards – Water Leaks on/near Electrical Equipment
Emergency Fire Exits – Emergency/Fire Exits Blocked/Unusable
HVAC – Misaligned Chimney/Ventilation System
Outlets/Switches/Cover Plates – Missing/Broken
Smoke Detector – Missing/Inoperable
Windows – Security Bars Prevent Egress

Unit

Air Quality – Propane/Natural Gas/Methane Gas Detected
Electrical Hazards – Exposed Wires/Open Panels
Electrical Hazards – Water Leaks on/near Electrical Equipment
Electrical System – Missing Breakers/Fuses
Electrical System – Missing Covers
Emergency Fire Exits – Emergency/Fire Exits Blocked/Unusable
Hot Water Heater – Misaligned Chimney/Ventilation System
HVAC – Misaligned Chimney/Ventilation System
Outlets/Switches – Missing
Outlets/Switches – Missing/Broken Cover Plates
Smoke Detector – Missing/Inoperable
Window – Security Bars Prevent Egress

4. **Current Policy.** The inspector includes all observed health and safety deficiencies in the inspection report. In addition, the inspector notifies the PHA of the observed EHS deficiencies at the end of each inspection or at the end of each day in a multi-day inspection. The inspector completes an “Exigent Health and Safety Notification Form” (the notification form) at the end of an inspection or at the end of each day, and delivers it to the PHA or property representative for signature.

After the inspection is reviewed and scored, the PHA is notified electronically that it may access the inspection summary report listing the score and deficiencies observed during the inspection. The inspection report is in a portable document format (PDF). The last page of the inspection summary report is the “PHA Certification of Repairs for Exigent Health and Fire Safety Hazards” (the certification form). On this form, PHAs list the EHS deficiencies and describe the corrective action that has been taken (e.g., replacing a broken cover plate on an electrical outlet). Each PHA then faxes the completed form to the appropriate Field Office.

5. **New Policy.** Effective immediately, PHAs are to begin using the new **online application** to report EHS deficiency correction/abatement activities to HUD. The online application will allow the PHA to enter correction and abatement activities for each EHS deficiency. As part of its review process, the Field Office staff will view the properties in their jurisdiction, conduct applicable follow-up activities with PHAs, and use the online system to report whether the EHS deficiencies have, in fact, been corrected or abated. All PHAs are to correct or abate EHS deficiencies within 24 hours after the inspection, and certify to the correction or abatement activity through the online application within three business days of the inspection.
6. **Appendix 1, PHA User Instructions,** explains how PHAs are to certify to the correction or abatement of EHS deficiencies observed during UPCS inspections. Appendix 1 includes instructions for PHA users to access the EHS certification system and helpful screen reproductions for the navigation of the system.
7. **Appendix 2, Field Office User Instructions,** outlines the procedures for Field Office staff to enter and record any follow-up activities that they have completed to ensure that EHS deficiencies have been corrected or abated.
8. **Paperwork Reduction Act.** The information collection requirements contained in this guidance have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3520) and assigned OMB Approval Number 2577-0241. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB Approval Number 2577-0241.
9. **Questions.** If you have any questions regarding this notice, contact PIH-REAC’s Technical Assistance Center at (888) 245-4860 (this is a toll free number).

Michael Liu, Assistant Secretary for
Public and Indian Housing