



DEFINITIONS SUPPLEMENT

**U.S. Department of Housing and Urban Development
Real Estate Assessment Center (REAC)**

10/01/2001

SITE

****CRACK (PARKING LOTS/DRIVEWAYS/ROADS)**

Deficiency: There are visible faults in the pavement: longitudinal, lateral, alligator, etc.

- Note:**
1. Do not include cracks on walkways/steps. For this to be a level 2 deficiency, 5% of the parking lots must be impacted--50 out of 1,000 square feet, for example.
 2. Relief joints are there by design; do not consider them cracks.
 3. When observing traffic ability, consider the capacity to support people on foot, in wheelchairs, and using walkers—and the potential for problems and hazards.
 4. For parking lots only, note a deficiency if you see cracks on more than 5% of the parking spaces.
 5. For driveways/roads, note a deficiency if you see cracks on more than 5% of the driveways/roads.

Level of Deficiency:

Level 1: N/A

Level 2: Cracks greater than 3/4 inch, hinging/tilting, or missing section(s) that affect traffic ability over more than 5% of the property's parking lots/driveways/roads.

Comments

Level 2: If the height differential is greater than 3/4 inch, consider this a safety hazard. If the condition of the surface could cause tripping or falling, you must manually record this deficiency as "Health and Safety: Hazards."

Level 3: N/A

Clarification on Parking Lots/Driveways (Site): At the beginning of the inspection, visually verify all measurement information. If that information is not provided, inspectors must measure the parking area. All parking areas are

included in the measurement and inspected in the site area, even those that may be designated to a particular unit.

Cracks in the pavement are a Level Two deficiency if they affect more than five percent of a parking lot or driveway, or if they measure greater than 4" X 4" and impede trafficability. Level Two includes other faults, such as hinging/tilting or missing sections that also meet the five percent threshold and impede traffic. Levels One and Three are N/A. Use square footage as the unit of measurement when determining if the crack meets the five percent threshold. The UPCS software will prompt you for the area measures after you indicate a parking lot deficiency. Calculate the area of **all** damage, even after you hit the threshold.

In addition, if the height differential of the fault is greater than three-fourths of an inch, manually record a tripping hazard in "Health and Safety: Hazards."

BUILDING EXTERIOR

PONDING (ROOFS)

Deficiency: You see evidence of areas of standing water--roof depression, mold ring, or effervescence water ring.

Note: If there has been measurable precipitation (1/10 inch or more) during the previous 48 hours, consider the impact on the extent of the ponding. Determine that ponding has occurred only when there is clear evidence of a persistent or long-standing problem.

Level of Deficiency:

Level 1: N/A

Level 2: N/A

Level 3: You see evidence of standing water on the roof, causing potential or visible damage to roof surface or underlying materials.

Comments

Level 3: If you have any doubt of the severity of the condition, an inspection by a roofing specialist is recommended.

How to apply this definition?

48 hours before conducting a physical inspection, check the local weather forecast to see if precipitation is expected. If there has been precipitation within 48 hours prior to your inspection, use your judgement in deciding if observable ponding is due to the recent precipitation or because of an ongoing problem. Keep in mind that some flat roofs are designed to allow ponding.

BUILDING SYSTEMS****MISSING/DAMAGED/EXPIRED EXTINGUISHERS (FIRE PROTECTION)**

Deficiency: A portable fire extinguisher is not where it should be, is damaged, or the extinguisher certification has expired.

- Note:**
1. This includes missing/damaged fire hoses where there are fire cabinets.
 2. For buildings with multiple fire control systems--standpipes, sprinklers, etc.--5% or less of the extinguishers for a given building may be missing, damaged, and/or expired. In such cases do not record as a deficiency.
 3. If the inspection tag is missing during the REAC inspection, the accompanying authority may produce proof that the fire extinguisher certification is current. If you see such proof, do not record a deficiency for a missing tag.

Level of Deficiency:

- Level 1: For a building with only one fire control system, 5% or less of the fire extinguishers are missing, damaged, or expired.
- Level 2: For all buildings, 5-10% of the fire extinguishers are missing, damaged, or expired.
- Level 3: For all buildings, more than 10% of the fire extinguishers are missing, damaged, or expired.

-OR-

There is not an operable/non-expired fire extinguisher on each floor.

How to apply this definition when the fire extinguisher tag is missing?

When you come across a fire extinguisher with a missing tag during a physical inspection, allow the accompanying authority the chance to present proof that the certification is current. There may not be time during the inspection, so allow the authority to present proof at the end of the inspection. If the authority cannot produce evidence that the fire extinguisher certificate is current on the day of the inspection, then record a deficiency for a missing tag.

COMMON AREAS

****DETERIORATED/MISSING SEALS (ENTRY ONLY DOORS)**

Deficiency: The seals and stripping around the entry door(s) to resist weather and fire are damaged or missing.

Note: This defect applies only to entry doors that were designed with seals. If a door shows evidence that a seal was never part of its design, do not record it as a deficiency.

Level of Deficiency:

Level 1: N/A

Level 2: N/A

Level 3: The seals are missing on one entry door, or they are so damaged that they do not function as they should.

How to apply this protocol?

If an entry door leads to the outside and has been designed with seals and/or weather stripping, those seals should be observed and undamaged. If both sides of the door are in a climate controlled environment (e.g., a hallway), or if the door is inside a dwelling unit, then deteriorated or missing seals is not an observable defect. In addition, the door must contain some evidence that a seal was incorporated into its design in order to be defective. Do not record any observations for doors in which it appears that the seals were installed by the residents.

While the rule can be somewhat confusing as to what constitutes a climate-controlled environment, generally only the front doors of a building, single family house, or townhouse require seals or weather stripping. All defects captured under Deteriorated/Missing Seals are Level Three.

COMMON AREAS

****POOL – NOT OPERATIONAL (COMMON AREAS)**

Deficiency: The pool was not in operation during the inspection

Note: If the pool is open for the season, it should be operational. If the pool is closed for the season, do not record this as a deficiency.

Level of Deficiency:

Level 1: N/A

Level 2: N/A

Level 3: The pool is not operational.

-OR-

You see unsafe conditions at the pool/pool area that could cause an injury.

How to apply this definition if a pool appears not operational?

Look for locked gates, drained pools and signage to establish that the pool facilities are closed for the season. If the accompanying authority says that the pool is closed for the season but there are no visible indications that it is, ask for proof such as a completed end of season maintenance work order or written notice sent to residents saying that the pool is closed for the season. If the pool appears to be not operational and the authority cannot establish that the season is over, record a deficiency.

UNIT****DAMAGED HARDWARE/LOCKS (DOORS)**

Deficiency: The attachments to a door that provide hinging, hanging, opening, closing, surface protection, or security, are damaged or missing. These include locks, panic hardware, overhead door tracks, springs and pulleys, sliding door tracks and hangers, and door closures.

- Note:** 1. If a door is designed to have a lock, the lock should work. If a door is designed without locks, do not record it as a deficiency.
2. If a lock has been removed from an interior door, do not record this as a deficiency.
3. 504 units have had locks removed. Before you start the inspection, you should be given a list of units relative to 504/FH/ADA. Do not record these missing locks as deficiencies.
4. For public housing, if a lock on a bedroom door is missing or damaged, do not record it as a deficiency.

Level of Deficiency:

Level 1: A closet door does not function as it should because of damage to the door's hardware.

-OR-

A closet door that requires locking cannot be locked because of damage to the door's hardware.

Level 2: A door does not function as it should because of damage to the door's hardware.

-OR-

A door that requires locking cannot be locked because of damage to the door's hardware.

Level 3: A bathroom door or entry door does not function as it should because of damage to the door's hardware.

-OR-

A bathroom door or entry door that requires locking cannot be locked because of damage to the door's hardware.

How to apply this definition?

While the definition can apply in slightly different ways to different kinds of units (e.g. public housing, 504/FH/ADA) the bottom line is the same: If hardware is present it should work. Do not record a deficiency for hardware that has been removed from an interior door.

UNIT**DOORS**

Means of access to the interior of a unit, room within the unit, or closet. Doors provide privacy and security, control passage, provide fire and weather resistance.

This inspectable item can have the following deficiencies:

- **Damaged Surface - Holes/Paint/Rusting/Glass
- **Damaged Frames/Threshold/Lintels/Trim
- **Damaged Hardware/Locks
- **Damaged/Missing Screen/Storm/Security Door
- **Deteriorated/Missing Seals (Entry Only)
- Missing Door

New Rule for Closed Doors:

While conducting a physical inspection do not attempt to open closed doors within the unit without the permission of the resident and/or accompanying authority.

How to apply this new rule?

This rule is designed for your security and safety and for the privacy of the residents. If you encounter a closed door while conducting a physical inspection ask the accompanying authority or the resident to open the door for you. This will prevent injury to yourself or an invasion of a resident's privacy while allowing you to conduct the inspection.

FIRE ESCAPES

All buildings must have acceptable fire exits. This includes both stairway access doors & external exits. These can include external fire escapes, fire towers, operable windows on the lower floors with easy access to the ground or a back door opening onto a porch with a stairway leading to the ground.

Blocked Egress/Ladders
Visibly Missing Components

Fire Exits (Egress)

- A. **Background.** The REAC inspection protocol requires properties to be decent, safe, sanitary, and in good repair. The UPCS software (version 2.3) identifies a number of fire safety deficiencies to ensure the safety of the residents. The ability of the residents to evacuate or egress rooms, units, and buildings during a fire or other emergency is of particular importance.

The UPCS software fire safety egress provisions are based on national codes, such as the *Building Officials and Code Administrators (BOCA) National Building Code (1999)* and the *National Fire Protection Association (NFPA) 101 Life Safety Code (1997)*. Specifically, BOCA 1010.2 prescribes a minimum of two independent exits for every floor area. Further, BOCA 1010.4 provides that every sleeping room below the fourth story shall have at least one operable window or exterior door for emergency escape or rescue.

The UPCS software allows the inspector to record a fire safety egress deficiency in three different areas, depending upon the following circumstances:

1. **Building Exterior Fire Escapes – Blocked Egress/Ladders** – All buildings must have acceptable fire exits. Acceptable fire exits include stairway access doors, external exits, external fire escapes, fire towers, and operable windows on lower floors that provide easy access to the ground or a porch/patio leading to the ground.

Deficiency – Blocked Egress/Ladders – Any part of a fire escape, including ladders, is blocked, limited, or restricting people from exiting.

2. **Building Exterior – Windows** – Window systems provide light, security, and exclusion of exterior noise, dust, heat, and cold. Frame materials typically include wood, aluminum, or vinyl. (Note: This does not include windows that have deficiencies noted in the inspection from the inside.)

Deficiency – Security Bars Prevent Egress – Exiting or egress is severely limited or impossible because bars are damaged, improperly constructed, or improperly installed.

3. **Health and Safety – Emergency/Fire Exits (Building Exterior)** – All buildings must have acceptable fire exits that are also properly marked and operational. Acceptable fire exits include fire towers, stairway access doors, external exits, operable windows on lower floors with easy access to the ground, and a door opening onto a patio or porch with a stairway leading to the ground. Note: This does not apply to individual units.

Deficiency – Blocked/Unusable – The exit cannot be used or the exit is limited because a door or window is nailed shut; a lock is broken; panic hardware is chained; or debris, storage, or other conditions cause the exit to be unusable.

- B. **Issue** – The above definitions do not sufficiently address the requirement that every floor area (e.g., room, unit, or building) have a minimum of two independent exits. The purpose of this notice is to provide inspectors with clarification on how to record deficiencies when they observe a floor area without two independent means of egress. In addition, inspectors have had questions regarding the use of window air conditioning (A/C) units and the situations when the existence of a window A/C unit constitutes blocked egress.
- C. **Clarification to the REAC inspection protocol.** All inspections occurring on or after the date of this notice shall reflect the following:
 1. The term “lower floors” cited in the definitions in Section A refers to all floors below the fourth story.
 2. Currently, the protocol definition for health and safety deficiencies (Health and Safety – Emergency/Fire Exits (Building Exterior)) reads: “Note: This does not apply to individual units.” (See A.3. above) **This is incorrect and is to be disregarded.** Any time a unit does not have two independent means of egress, the inspector should record a health and safety deficiency.

3. The following bullets outline the protocol for window A/C units, as prescribed in *BOCA National Building Code* 1010.2 and 1010.4. If a floor area (e.g., room, unit, or building) has a window with an air conditioning unit mounted in the window frame, but has at least one other window and an exit door, there is **no** blocked egress. The inspector **should not** record a deficiency.

If the only window in a floor area has a window A/C unit mounted in the window frame, and the area has only one exit door, there is blocked egress. The inspector **should** record a deficiency under “Health and Safety – Emergency/Fire Exits (**Dwelling Units**) – Blocked/Unusable.”

4. If a floor area has a window(s) or door(s) blocked by furniture, and no other unobstructed means of safe egress, the inspector should record a health and safety deficiency – Health • Page 3 Special Bulletin #18 – Acceptable Fire Exits and Safety – Emergency/Fire Exits (Building Exterior **or Dwelling Units**) – Blocked/Unusable. In the comment field for the deficiency, the inspector should 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. For example, if a resident could safely step over a couch or bed to climb safely through a window, the inspector should not record a deficiency.

D. **Owner/Public Housing Agency (PHA) Guidance.** HUD is not preventing owner/PHA-approved or resident-installed air conditioning window units. HUD fully recognizes that there are cases when the health concerns of the residents may necessitate window A/C units. At the same time, HUD is mindful of the health and fire safety concerns that arise when a building, unit, or room does not provide sufficient egress in the case of fire. It is the responsibility of the owner or PHA to work with the resident to develop a solution that balances health concerns with fire safety issues. There are many ways to mitigate the fire safety risk caused by a window A/C unit. For example, the A/C unit may be placed in a room that provides the necessary fire exits, or it may be placed in a through-the-wall sleeve rather than a window, or the owner/PHA may relocate a resident to a unit where an A/C unit can be installed without creating an egress problem. In the event that none of the above suggestions are feasible, HUD will consider a request from the owner/PHA for a database adjustment that meets the following four conditions:

1. Each request must be property specific and include the HUD project number.

2. The request may be made at any time before the inspection, or up to 15 (public housing) or 45 (multifamily housing) days following the inspection.
3. The owner/PHA must submit (a) a signed statement from the local fire marshal (or equivalent) citing the provision or language in the local fire code that allows the condition observed (i.e., a blocked means of egress) in a floor area without at least two other means of egress; and (b) a copy of the provision or language cited.
4. The owner/PHA must submit a statement for each project of the potential alternatives and why no other alternatives are feasible.

HUD will review the request for a database adjustment and the documentation required above. If the request is approved, HUD will restore any points deducted as a result of the blocked egress deficiency cited in the inspection report.