



SPECIAL ATTENTION OF:

Regional Administrators;
Regional and Field Office Directors of Public Housing;
Multifamily Regional Center/Satellite Office Directors;
Public Housing Hub Office Directors;
Public Housing Program Center Directors;
Public Housing Agency Directors;
Housing Owners/Managers/Agents;
Healthy Homes Representatives;
Tribes; Tribally Designated Housing Entities; Indian Housing Authorities; Office of Native American Programs Administrators

NOTICE PIH 2019-06
NOTICE H 2019-05
NOTICE OLHCHH 2019-01

Issued: April 18, 2019

This notice remains in effect until amended, superseded, or rescinded

CROSS REFERENCES: 24 CFR 5.703(f); 24 CFR 982.401(h)(2); MF HB 4350.1; REAC Inspector Notice 2019-01; OLHCHH Healthy Homes Strategy for Action.

Subject: Carbon Monoxide Detectors in HUD-Assisted Housing

Purpose: The Offices issuing this notice are doing so to:

- **Remind** owners, managers, and agents of certain HUD-assisted housing to have operational carbon monoxide (CO) detectors, where specified, as required by the state or local law, code, or other regulation. The programs covered are the Public Housing, Section 8 Project-Based Rental Assistance, Housing Choice Voucher (tenant-based or project-based), Section 202 (Supportive Housing for the Elderly), Section 811 (Supportive Housing for Persons with Disabilities), and tribal programs administered by the Office of Native American Programs (ONAP).
- **Strongly encourage** owners, managers, and agents of housing covered by the HUD assistance programs above, located in areas where state or local law, code or other regulations do not require CO detectors, to have operational CO detectors (1) in units that have fuel-fired/burning appliance(s) and/or an attached garage, and (2) in bedrooms that contain a fireplace or a fuel-fired or burning appliance.

Background: This notice is being issued as part of the Secretary's efforts to support decent, safe and sanitary housing in HUD's low income housing assistance programs. CO poisoning is a serious issue in housing across the nation. As the Environmental Protection Agency (EPA) notes:

Carbon monoxide is an odorless, colorless and toxic gas. Because it is impossible to see, taste or smell the toxic fumes, CO can kill you before you are aware it is in your home. The effects of CO exposure can vary greatly from person to person depending on age, overall health and the concentration and length of exposure.¹

¹ EPA. Carbon Monoxide's Impact on Indoor Air Quality. Oct. 25, 2018. www.epa.gov/indoor-air-quality-iaq/carbon-monoxides-impact-indoor-air-quality.

Each year, there are over 11,000 CO exposure cases reported to poison control centers² and more than 400 deaths due to CO poisoning.³ CO death rates are highest for men, non-Hispanic blacks, and the elderly.

Implementation: Because CO is undetectable through sight, smell, sound, or touch, a device – a CO detector – is necessary to determine the presence of high and dangerous concentrations of CO in a residence. The detectors are typically installed outside of sleeping areas in units with fuel-fired/burning appliance(s), and/or an attached garage, and installed in bedrooms that contain a fireplace or fuel-fired or burning appliance.

Often, a combination smoke detector–CO detector device can be used instead of installing two devices; HUD encourages using combination detectors where they are not prohibited by state or local requirements. Similarly, it is efficient to replace a smoke detector already required to be in a unit covered by this notice⁴ with a combination detector when the smoke detector’s sensor dies, if this has not been done beforehand. Owners should also consider installing a hard-wired detector with a battery backup even where it is not required by local law.

On March 25, 2019, the Office of Public and Indian Housing’s Real Estate Assessment Center (REAC) issued an Inspector Notice that establishes guidance to all UPCS inspectors who conduct physical inspections of HUD-assisted and insured properties about performing a data collection process to determine the prevalence of CO detection systems at HUD properties subject to UPCS inspection.⁵ That REAC Notice also applies to HUD assisted and insured properties subject to UPCS inspection, and other projects involving properties inspected under the REAC physical inspection protocol.

Although not subject to UPCS inspection, HUD strongly encourages Indian tribes and tribally designated housing entities (TDHE) receiving assistance under ONAP programs to include functional CO detectors (either stand-alone or combination smoke detectors-CO detectors) as part of their tribal housing quality standards, and to have their inspectors routinely check for their prevalence and that the detectors are operational.

HUD anticipates issuing further guidance and instructions on this important public health issue. In addition, HUD will pursue rulemaking for the Housing Choice Voucher, Multifamily and Public Housing Programs to add a requirement for functioning carbon monoxide detectors in units with fuel-fired/burning appliance(s), and/or an attached garage.

² 2017 Annual Report of the American Association of Poison Control Centers’ National Poison Data System. <https://piper.filecamp.com/uniq/cwK5Ko3PLwXzfBkk.pdf>, page 181, and similarly for the 2016 and 2015 Annual Reports (www.aapcc.org/annual-reports/).

³ Sircar K, Clower J, Shin MK, Bailey C, King M, Yip F. Carbon monoxide poisoning deaths in the United States, 1999 to 2012. *Amer. J. Emerg. Med.* 33(9):1140–1145. Sept. 2015. <https://doi.org/10.1016/j.ajem.2015.05.002>.

⁴ Per the Uniform Physical Condition Standards (UPCS) (at [24 CFR 5.703](https://www.ecfr.gov/current/title-24/chapter-I/subchapter-D/part-5703)(d)(4)) or the Housing Quality Standards (HQS) (at [24 CFR 982.401](https://www.ecfr.gov/current/title-24/chapter-I/subchapter-D/part-982.401)(n)), as applicable to the assistance program.

⁵ REAC. Carbon Monoxide Detection Systems 4.0 Software Documentation Requirements. Inspector Notice No. 2019-01. [www.hud.gov/sites/dfiles/PIH/documents/Carbon Monoxide Notice 2019-01.pdf](http://www.hud.gov/sites/dfiles/PIH/documents/Carbon_Monoxide_Notice_2019-01.pdf)

Further Information: Questions concerning this notice may be directed to the:

- PIH Real Estate Assessment Center at NSPIRE@hud.gov;
- Brandt Witte, Multifamily Office of Asset Management and Portfolio Oversight, at 202-402-2614;
- Lead Regulations Hotline, Office of Lead Hazard Control and Healthy Homes, at 202-402-7698; or
- Appropriate Area ONAP.

The numbers above are not toll-free. Persons with hearing or speech impairments may access them via TTY by calling the toll-free Federal Information Relay Service at 800-877-8339.

/s/
R. Hunter Kurtz
Principal Deputy Assistant
Secretary for Public and
Indian Housing

/s/
Brian D. Montgomery
Assistant Secretary for
Housing – Federal
Housing Commissioner

/s/
Matthew Ammon
Director, Office of Lead
Hazard Control and
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