



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

Special Attention of:

Public Housing Agencies (PHA);
Public Housing Hub Office Directors;
Public Housing Program Center Directors;
Regional Directors;
Field Office Directors; and
Resident Management Corporations

Notice PIH 2019-25

Issued: October, 11 2019

This notice remains in effect until amended, superseded or rescinded.

Cross Reference: N/A

SUBJECT: Public and Indian Housing (PIH) Public Housing Program Policy on Emergency Call Systems

1. PURPOSE

The purpose of this notice is to issue guidance on applicable PIH policies related to emergency call systems in public housing properties. The Transportation, and Housing and Urban Development, and Related Agencies Appropriations Bill, 2019, Senate Report 115-268 directs PIH to issue clarifying guidance regarding emergency call systems in PHA-managed multifamily properties and to update related Real Estate Assessment Center (REAC) inspection protocols, if so warranted.

2. APPLICABILITY

This notice applies to all PHAs and localities that operate a public housing program, including Moving-To-Work (MTW) agencies.

3. EMERGENCY CALL SYSTEMS IN PUBLIC HOUSING

There is no programmatic requirement for PHAs to install emergency call systems such as call-for-aid pull cords, or modern wireless electronic notification system technology in any public housing property, including properties that are occupied by the elderly or disabled or designated for occupancy by disabled, elderly, or disabled and elderly households. Further, PIH does not prescribe which type of emergency call systems PHAs should use when they are present in the respective properties.

However, systems may be required to be installed and operable as reasonable accommodations, modifications, and/or auxiliary aids or services pursuant to Section 504 of the Rehabilitation Act,

29 U.S.C. § 794; Title II of the Americans with Disabilities Act, 42 U.S.C. § 12131-12134; and the Fair Housing Act, 42 U.S.C. § 3601 et seq.

If a PHA has call-for-aid pull cords, wireless electronic notification systems, or other similar emergency call systems in a public housing property, then the systems must function as intended in accordance with HUD's physical condition standards and inspection requirements under 24 CFR §5.703(d). These particular emergency call systems are subject to REAC inspection protocols and must also be tested, except for modern wireless electronic notification systems worn as personal devices.

This guidance is not intended to require PHAs to replace older emergency call systems with newer wireless or electronic technology; however, where a PHA utilizes call-for-aid pull cords, REAC inspectors must verify if the system functions as intended. Regardless of where the call-for-aid pull cords are placed, cords must be accessible. If a call-for-aid pull cord is inaccessible, or one of the system components (light, buzzer, or notification signal/annunciator board) does not function as intended when tested, this is cited as a Level 3 non-life-threatening health and safety deficiency.

Installed call-for-aid cords must serve their intended function (e.g., when activated, a bell sounds an alarm, a light is turned on, or personnel (on-site or off-site) are notified). If the PHA has replaced an old call-for-aid system, the presence of any part of the original/replaced system that remains, such as a pull cord, must be tested and recorded as a deficiency during the inspection if inoperable and does not function as intended.

The Emergency Call system shall be deemed operable and accepted as part of a REAC inspection if all of the following conditions are met:

- The system works as intended.
- The system sounds an alarm to summon help from the intended source, and/or actuates a signal, which may be visual, audible, or both.
- The system is available in each bathroom and each bedroom location in dwelling units.

4. FURTHER INFORMATION

For additional information or questions regarding this notice, please contact the local Public Housing Field Office Director or the Public Housing Management and Occupancy Division's policy mailbox at PublicHousingPolicyQuestions@hud.gov. Any persons with hearing or speech impairments may access this contact by calling the Federal Information Relay Service at 800-877-8339.

/s/

R. Hunter Kurtz,
Assistant Secretary
for Public and Indian Housing