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Inspections

During the pandemic, HUD recognized that conducting inspections may not be possible or, in some instances, safe. PHAs were able to adopt several waivers that delayed inspections for the Housing Choice Voucher (HCV) program (including the Project Based Voucher program), Public Housing program, and the Moderate Rehabilitation (Mod Rehab) program.

For the **Housing Choice Voucher program**, HUD permitted PHAs to adopt waivers to postpone normally required Housing Quality Standards (HQS) inspections and provided alternative requirements, such as owner certification.

In the **Public Housing program**, PHAs could adopt a waiver of inspections in calendar year (CY) 2020 while reinstating inspections in CY 2021 and completing the inspection of each property by December 31, 2021.

For the **Mod Rehab program**, PHAs that implemented the waiver are required to complete annual inspections as soon as reasonably possible, but no later than one year after the date that the annual inspection would have been required without the waiver.

PHAs that delayed inspections under these waivers must complete inspections as soon as reasonably possible but must resume regular inspections by the dates identified below. PHAs must complete all delayed unit inspections no later than the dates listed below.

This section contains information applicable to the Public Housing, Mod Rehab, and Housing Choice Voucher programs.

Remote Video Inspections (RVI)

Remote Video Inspections (RVI) are full housing inspections in which inspectors use video technology to inspect units remotely. RVI represents new technology that many PHAs embraced during the pandemic and PHAs can continue to employ the technology as part of their inspection strategy for its HCV and Public Housing programs.

Any PHA that has adopted RVIs, or those that wish to moving forward, may continue to do so after the waivers expire. Please see [PIH Notice 2020-31: Remote Video Inspections for Housing Choice Voucher Program](#) for requirements on how to conduct Housing Quality Standards (HQS) inspections using RVIs. Although this notice is targeted to the HCV program, many of the processes can be adapted for Public Housing inspections.

If a PHA has decided to incorporate technology into the inspection process, it must have determined prior to implementation if this is a significant amendment to the Annual Plan and evaluate whether the inspection process requires an update of the HCV Administrative Plan or the Public Housing Admissions and Continued Occupancy Policy (ACOP).

PHAs may conduct the following types of inspections using Remote Video Inspections:

- Initial Inspections
- Biennial and Triennial Inspections
- Interim Inspections
- At other times as needed

Public Housing

PH-12: Public Housing Agency Annual Self-Inspections

Period of Availability: July 2, 2020, to December 31, 2020

HUD waived the requirement that PHAs must inspect each public housing project during CY 2020.

PHAs that delayed inspections from CY 2020 by adopting this waiver are required to complete an annual self-inspection of every public housing development by December 31, 2021 and continue annual inspections into CY 2022. PHAs have likely planned for and are conducting inspections in CY 2021, however, if PHAs have delayed inspections, HUD strongly encourages PHAs to prioritize inspections during the last quarter of the calendar year.

HUD does not prescribe a particular inspection methodology, i.e., PHAs may use their own sampling or inspection criteria and alternate methods of inspections, including remote video inspections, to conduct inspections to limit risk of transmission of COVID-19. PHAs can be proactive in training residents on what the PHA is looking at in an inspection and asking residents to conduct their own pre-inspections to expedite the inspection process. If a PHA chooses to institute remote video inspections (RVI), the PHAs Admissions and Continued Occupancy Policy (ACOP) may be updated as needed, to reflect the use of this option.

To meet the requirement of completing all inspections, PHAs may consider contracting with qualified individuals or firms to complete the inspections or to provide support in other areas, enabling PHA staff to complete required inspections.

HCV - Housing Quality Standards (HQS)

Key Dates for Housing Choice Voucher HQS inspections

Notice PIH 2021-14 established the HQS waivers and timeframes for returning to normal operations. Below is a summary of important deadlines for any PHA that adopted HQS waivers:

No later than December 31, 2021, PHAs must resume:

- Initial pre-HAP inspections (for both HCV and PBV)
- Scheduled biennial (or triennial) inspections
- Regular procedures for interim inspections
- Inspecting units that have passed a prior alternative inspection
- Initial HQS inspections for units that families wish to purchase under the HCV homeownership option

For units that received owner certification in lieu of an HQS inspection, PHAs must complete an HQS inspection by the following dates. Note that PHAs may implement RVI to complete inspections.

To ensure PHAs complete all required inspections, including the inspections for 2022, PHAs may establish monthly goals to ensure scheduling and completion of outstanding HQS inspections.

Beginning January 1, 2022

- All HQS inspection requirements are applicable to the HCV and PBV programs.

No later than June 30, 2022, PHAs must complete:

- Delayed initial Pre-HAP contract inspections (for both HCV and PBV)
- Delayed CY 2020 biennial HQS inspections
- Delayed PBV turnover inspections
- Delayed inspections for PBV units added to a HAP contract

No later than December 31, 2022

- PHAs must complete all delayed CY 2021 biennial inspections

No later than the 1-year anniversary of the date of the owner's certification.

- PHAs must inspect units that were placed under HAP contract using the initial inspection alternative option

WHAT PHAs CAN DO

Creating a plan for conducting the delayed inspections as well as keeping up with initial inspections, interim inspections, and quality control inspections is essential for a PHA to meet the deadlines. PHAs can layout a schedule for completing delayed inspections of units, while ensuring that there is time allotted for inspecting new units and responding to requests for special interim inspections.

For developing the schedule, PHAs have flexibilities in determining how to get back on schedule. PHAs may schedule inspections by chronological order, neighborhood, or region. Alternatively, PHAs may prioritize inspections by those units that have been without an inspection by PHA staff the longest. It is up to the PHA to determine the best methodology for accomplishing the inspections to return to a regular cycle.

PHAs also can adopt methods other than in-person or Remote Video Inspections to confirm that deficiencies found during an inspection have been repaired or abated. PHAs may require an owner certification that the deficiency was addressed or may require a certification from the owner and participant.

As described above, Remote Video Inspections (RVI) can be a great time saver for the PHA as it eliminates the travel time to the unit. But the use of RVI may not be enough for PHAs facing staffing shortages and with a backlog of inspections to complete.

PHAs may wish to issue a request for proposals (RFP) to obtain assistance in meeting the inspection deadlines. Since all PHAs have the same inspection deadlines, issuing the RFP as soon as possible is critical in obtaining quality inspectors to provide the assistance needed.

Another avenue is for PHAs is to contract with temporary inspectors to reduce the backlog. One group that requires minimum training to conduct HQS inspections are firefighters. Although HQS differs from local building codes, firefighters have building knowledge and, because of their schedules, may be able to help on weekends and early evenings. Another possible source for inspectors is the PHA's own public housing maintenance staff. Training on HQS would be relatively easy for the maintenance staff and they may be willing to work on weekends as well.

To prepare owners and participants for inspections, PHAs can use existing owner portals, electronic newsletters, or mailers. Although most owners and participants are aware of the requirements of HQS, reminders of the criteria as well as common issues found in the PHA's jurisdiction may help to minimize the deficiencies noted during inspections.

HOTMA NLT and Alternative Inspection Provision

PHAs that have adopted the HOTMA HQS non-life-threatening (NLT) or alternative inspection provisions for their Housing Choice Voucher program may still use those provisions (as detailed in [PIH 2017-20](#)) to enter into a HAP contract prior to a unit passing HQS.

Correcting Errors in Owner Certification

In the HCV program, if it is determined that an owner's certification was inaccurate, PHAs must implement remedies in accordance with the PHA's policies and procedures.

If an owner certified incorrect technical data elements regarding the unit on the Request for Tenancy Approval or the inspection (address, unit number, number of bedrooms, rent amount), the PHA must investigate the certification to determine if it is an error or fraud. The PHA must correct the HAP payment accordingly retroactive back to the date of the error. In situations involving fraud, the PHA may terminate the HAP contract and issue the family a new voucher, in accordance with PHA policy.

WHAT PHAs CAN DO

Beginning January 1, 2022, owners will continue certifying information on the Request for Tenancy Approval. PHAs can routinely verify the technical data elements about the unit when conducting the initial inspection, even if the inspection is conducted remotely. Correcting these elements at the outset will lead to fewer corrections in the future.

HQS-1: Initial Inspection Requirements

Period of Availability: April 10, 2020 to December 31, 2021

PHAs that adopted this waiver were permitted to change initial inspection requirements, allowing for owner certification and the owner has reasonable knowledge that there are no life-threatening deficiencies in the unit. Where self-certification was used, the PHA must inspect the unit no later than June 30, 2022.

As this waiver expires, PHAs must identify all units that received owner's certification in lieu of pre-HAP contract HQS inspection and schedule HQS inspections to be completed no later than June 30, 2022. In fulfilling this requirement, this inspection may also serve as the PHAs obligation to inspect the unit biennially. If the PHA imposed any additional requirements or conditions in addition to the owner certification, the PHA must review all initial leases covered by the waiver (and if needed schedule HQS inspection or re-inspection protocol) to ensure the owner was in compliance.

Beginning January 1, 2022, PHAs must inspect units before the beginning of the initial lease term. PHAs may not approve the assisted tenancy or execute a HAP contract until the unit has been

inspected by the PHA and passes HQS; unless the PHA implements the non-life-threatening (NLT) provision or alternative inspection process as provided by HOTMA and the requirements in [PIH Notice 2017-20](#). PHAs are permitted to use RVI for initial HQS inspections as well as to determine if deficiencies have been corrected.

HQS-2: Project-Based Voucher (PBV) Pre-HAP Contract Inspections: PHA Acceptance of Completed Units

Period of Availability: April 10, 2020, to December 31, 2021.

PHAs that adopted this waiver were permitted to change inspection requirements, allowing for owner certification that there are no life-threatening deficiencies in the PBV unit. Where self-certification was used, the PHA must inspect the unit no later than June 30, 2022.

As this waiver expires, PHAs should identify all units that received owner's certification in lieu of pre-HAP PBV contract HQS inspection and must schedule HQS inspections as soon as reasonably possible but no later than June 30, 2022.

Beginning January 1, 2022, PHA must inspect units before the execution of a PBV HAP contract. PHAs may not execute a PBV HAP contract until each contract unit has been inspected by the PHA and passes HQS unless the PHA is implementing the non-life-threatening (NLT) provision and alternative inspection process as provided by the requirements in [PIH Notice 2017-20](#). PHAs are permitted to use RVI for initial HQS inspections of PBV units.

HQS-3: Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option

Period of Availability: April 10, 2020 to December 31, 2021.

Under the NLT initial inspection waiver, the PHA could approve an assisted tenancy, execute a HAP contract, and begin making HAP payments for a unit that failed HQS due to non-life-threatening conditions. The NLT conditions are required to be repaired within 30 days or the PHA must withhold payments. PHAs that adopted this waiver were permitted to provide an extension of up to thirty days to the owner to make the repairs and continue to make payments to the owner during the extension period.

Beginning January 1, 2022, PHAs may no longer provide this extension to the owner to make the repairs and must withhold payments if the NLT deficiencies are not corrected within 30 days.

Extensions granted under this waiver to make the NLT repairs may extend beyond December 31, 2021, depending on the date the PHA approved the extension. For example, if the PHA approved the extension on December 15, 2021, the maximum extension provided to the owner would be January 14, 2022. Verifying that the repairs have been completed timely and the unit passes HQS should be a priority of the PHA. Verification that the repairs have been completed can be through an in-person inspection or RVI.

HQS-4: HQS Initial Inspection Requirement: Alternative Inspection Option

Period of Availability: April 10, 2020 to December 31, 2021.

Under Initial HQS Alternative Inspection Option waiver, a PHA was permitted to begin assistance payments based on an alternate inspection conducted within the previous 24 months and an owner certification that the owner had no reasonable basis to have knowledge that life-threatening deficiencies exist in the tenant based or project-based unit. A PHA that adopted this waiver was required to conduct the HQS inspection for the unit as soon as reasonably possible, but no later than the 1-year anniversary date of the owner’s certification.

For example, a PHA that adopted this waiver began making HAP payments based on an alternate inspection and unit owner certification of a unit on November 20, 2021; the HQS inspection must be completed no later than November 19, 2022. The inspection may be an RVI. Beginning January 1, 2022, PHAs that adopted the alternative inspection provision must schedule an HQS inspection of units that received an alternative inspection and owner certification within 15 days of receipt of the Request for Tenancy Approval.

HQS-5: HQS Inspection Requirement: Biennial Inspections

Period of Availability: April 10, 2020 to December 31, 2021.

PHAs that adopted this waiver were allowed to delay biennial inspections. Under this waiver, PHAs must require owner certification that there are no life-threatening deficiencies and PHAs must conduct all delayed biennial inspections from CY 2020, as soon as reasonably possible but no later than June 30, 2022, and must conduct all delayed biennial inspections from CY 2021 as soon as reasonably possible but no later than no later December 31, 2022.

PHAs may use an RVI inspection protocol. Once the unit has been inspected and determined to meet HQS, PHAs may resume their biennial, or triennial (if small and rural), inspection schedules.

The chart below shows when inspections must be completed, depending on what type of inspection system is used by the PHA.

	PHA Must Conduct Biennial Inspections by	Small and Rural PHA Must Conduct Triennial inspections by
Last inspection on 6/1/2018	6/30/2022	6/30/2022
Last inspection conducted on 6/1/2019	6/30/2022	6/30/2022
Next inspection conducted on 6/1/2022	6/1/2024	6/1/2025

HQS-6: HQS Interim Inspections

Period of Availability: April 10, 2020 to December 31, 2021.

PHAs that implemented this waiver were not required to conduct HQS inspections when notified that a unit does not comply with HQS. Instead, PHAs could adopt an alternative method for both tenant-based and PBV units. Under the alternative method, PHAs could notify the owner who was required to investigate the issue and correct life-threatening deficiencies within 24 hours or NLT within 30 days.

Beginning January 1, 2022, PHAs must conduct an interim inspection of a reported life-threatening deficiency within 24 hours and an NLT deficiency within 15 days. This inspection may be conducted via RVI. There is no HUD requirement that the verification to determine if the deficiency has been corrected be conducted in person. The verification may be by RVI, photos submitted by the owners, tenant certification, or other method defined by the PHA.

HQS-7: PBV Turnover Unit Inspections

Period of Availability: April 10, 2020 to December 31, 2021.

PHAs that adopted this waiver were permitted to allow PBV turnover units to be filled based on owner certification that there are no life-threatening (NLT) deficiencies in the unit, rather than an HQS inspection. It further allowed for delayed full HQS inspection no later than June 30, 2022.

For any PBV turnover units for which a PHA accepted an owner's self-certification, the PHA must conduct an HQS inspection as soon as reasonably possible but no later than June 30, 2022. Beginning January 1, 2022, PHAs must resume conducting PBV HQS unit inspections prior to assisting a new family in a PBV contract unit, even if it is a turnover unit. These inspections may be conducted via RVI.

HQS-8: PBV HAP Contract: HQS Inspections to Add or Substitute Units

Period of Availability: April 10, 2020 to December 31, 2021.

Once adopted by a PHA, the PHA could add or substitute in the units in a PBV HAP contract based on owner certification that there are no life-threatening deficiencies. A full HQS inspection must be completed prior to June 30, 2022.

Starting January 1, 2022, before adding or substituting a PBV unit to the HAP contract, the PHA must conduct an HQS inspection. The PHA may use the RVI inspection process.

HQS-9: HQS Quality Control Inspections

Period of Availability: Begins April 10, 2020 to December 31, 2021.

PHAs that adopted this waiver were not required to conduct HQS Quality Control inspections.

Starting January 1, 2022, PHAs must resume conducting supervisory HQS quality control inspections on a sampling of units.

WHAT PHAs CAN DO

HQS Quality Control inspections have been a hallmark of the HCV program since its inception.

Although final guidance on SEMAP is pending, PHAs should continue HQS QC inspections to verify that inspections are being conducted properly and to ensure program integrity.

HQS-10: Housing Quality Standards: Space and Security

Period of Availability: Begins April 10, 2020. Remains in effect one year from lease term or May 3, 2022.

If a PHA adopted this waiver, existing participants may add members to the household, even if the additional members would result in the unit not meeting the space and security standards. This waiver did not apply to initial lease-ups.

Families that are occupying an assisted unit that does not meet the space and security requirements may continue occupying the unit for the duration of their current lease term or until May 3, 2022, whichever period is longer. At the end of the lease term, if the family is still under-housed, the family must be issued a new larger voucher in accordance with PHA policy to move to a unit that meets the HQS space and security standards.

WHAT PHAs CAN DO

To relieve the tension associated with moving, the PHA can communicate regularly with the family to ensure they understand that they will be issued a voucher to move to a new, larger unit. The sooner the family is issued the voucher, the longer they may have to locate a unit. In tight housing markets, search assistance may benefit the participant. Some of the anxiety around moving to the new unit is the increased expense of living in a larger home, such as higher utility costs. PHAs or their community partners can provide budgeting assistance to the family, so they are successful in their new home.

HQS-11: Homeownership Option: Initial HQS Inspection

Period of Availability: April 10, 2020 to December 31, 2021.

PHAs could adopt this waiver under which PHAs were not required to perform an initial HQS inspection prior to making HAP payments for homeownership vouchers. Instead, the PHA can review

the independent inspection report and still have discretion to disapprove the unit based on information in the inspection report.

On January 1, 2022, PHAs must return to conducting initial homeownership HQS inspections prior to the PHA determining the unit is eligible for HCV homeownership assistance. An RVI inspection may be used at the PHA's discretion. The PHA has discretion to disapprove a unit based on the inspection report but is not required to use the report to determine whether to approve the unit.

Moderate Rehabilitation

MR-5: PHA Inspection Requirement: Annual Inspection

Period of Availability: August 26, 2020 until up to one year after the annual inspection was due originally.

HUD waived the requirement that PHAs must inspect each Moderate Rehabilitation (Mod Rehab) unit annually.

PHAs that adopted this waiver are required to complete an inspection of every Mod Rehab unit as soon as reasonably possible, but no later than one year after the date that the annual inspection would have been required. These inspections are designed to ensure that units are maintained to HUD standards. PHAs may use alternate methods of inspections, including remote video inspections. To complete all inspections, PHAs may consider contracting with knowledgeable individuals or firms to complete the inspections or to provide support in other areas.