Physical Assessment
System Overview
PASS Overview

The Physical Assessment Subsystem (PASS) measures the physical condition of HUD properties through an inspection process.

- **Objective:** To determine whether a PHA’s housing stock is meeting the standard of *decent, safe, sanitary,* and is in *good repair.*

- **What regulation established requirements for Physical Inspections?**

**Federal Register 24 CFR, Parts 5 and 200** – Uniform Physical Condition Standards and Physical Inspection Requirements for Certain HUD Housing; Administrative Process for Assessment of Insured and Assisted Properties; Final Rule
What is the purpose of a REAC inspection?

PHAs perform annual physical inspections in accordance with the Uniform Physical Condition Standards (UPCS). The inspection must include 100% of the property, not just a sampling of the units, and the deficiencies identified must be corrected.

The REAC inspection is actually just a quality assurance review of the PHA’s 100% inspection. REAC inspects only a random sampling of the property to determine if the property is being properly maintained.

HUD Quality Assurance Reviewers/Inspectors then monitor the certified inspectors’ performance, by reviewing a sample of those inspections.
Why follow UPCS?

If the PHA is diligently inspecting and maintaining the property, applying the same standards as REAC, the PHA will know what deficiencies the REAC inspector is likely to identify and can correct them prior to the REAC inspection.

If the PHA understands and follows the UPCS, the physical condition inspection score determined by REAC for PHAS Indicator 1 should be high.

PHAs can contact REAC at Reacpasstraining@hud.gov to schedule UPCS training.
What are Uniform Physical Condition Standards (UPCS)?

The standards are the foundation of the physical inspection program. They

- Identify the five (5) inspectable areas and exigent health and safety hazards
- Standardized definitions for inspectable items
- Provide uniform, objective protocol for training inspectors to perform inspections of all property types and sizes, at any location
Who orders physical inspections?

**Inspection Contractors** - UPIC contractors are private inspection firms that have entered into contract with HUD to complete inspections of public and multifamily housing properties.

**HUD** - HUD may assign Quality Assurance inspectors to perform initial inspections or to conduct follow-up inspections.
Who performs the inspections?

REAC Inspections are performed by HUD-certified inspectors.

Inspectors must successfully complete REAC’s UPCS Inspector training and certification course and maintain their certifications according to strict requirements.

A representative of the housing authority must always accompany the inspector throughout the inspection.
How is inspection data collected and reported?

UPCS Inspection software is loaded on a hand-held data collection device (DCD) carried by the inspector during the inspection.

On site, the inspector uses the DCD to read the definitions and record deficiencies. A clear definition of each deficiency is contained in the software.

All HUD-certified inspectors perform inspections using this method to ensure consistent, objective, factual and comprehensive collection and reporting of inspection data.
What is the UPCS Inspector’s role in the inspection process?

- Verifies the property profile
- Observes deficiencies
- Classifies deficiencies based on the severity of the problem (Level 1, Level 2 and Level 3)
- Records each deficiency and the level of severity in the (DCD) while on site
- Notifies PHA of Exigent Health and Safety Hazards before leaving the property
- Uploads inspection results to REAC via the Internet
PASS Sub Indicators and Weighting

Property

Site (15%)

Building Exterior (15%)

Building Systems (20%)

Common Areas (15%)

Dwelling Units (35%)

Health and Safety (across all areas)
How Do I Improve My PASS Score?

Conduct routine maintenance on all properties and all units

- Compare previous years’ (1 or more) PASS deficiencies and improve upon them for the current year by using PIH-REAC reports in Secure Systems

- Pay close attention to Exigent Health and Safety (EHS) (life threatening) deficiencies such as:
  - Inoperable or missing smoke detectors
  - Missing or damaged fire extinguishers
  - Exposed wiring or open panels

- Anticipate repairing common deficiencies
How Does Making Improvements Apply to My PHA?

Real World Example: PHA XY123

<table>
<thead>
<tr>
<th>PHA Code</th>
<th>Designation</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>XY123</td>
<td>Substandard Physical</td>
<td>80</td>
</tr>
</tbody>
</table>

**FYE 6/30/02**

<table>
<thead>
<tr>
<th>PHAS Indicator</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Physical</td>
<td>13</td>
</tr>
<tr>
<td>Financial</td>
<td>28</td>
</tr>
<tr>
<td>Management</td>
<td>30</td>
</tr>
<tr>
<td>Resident</td>
<td>9</td>
</tr>
<tr>
<td>PHAS Total Score</td>
<td>80</td>
</tr>
</tbody>
</table>

**Systemic Deficiencies** for FYE 2002:

<table>
<thead>
<tr>
<th>Area</th>
<th>Item</th>
<th>Defect</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit</td>
<td>Bathroom</td>
<td>Lavatory sink- damaged/missing</td>
</tr>
<tr>
<td>Unit</td>
<td>Kitchen</td>
<td>Range/stove- Inoperable</td>
</tr>
<tr>
<td>Unit</td>
<td>Doors</td>
<td>Doors damaged- cannot lock properly</td>
</tr>
<tr>
<td>Unit</td>
<td>Lighting</td>
<td>Missing fixture</td>
</tr>
<tr>
<td>Unit</td>
<td>Outlet/Switches</td>
<td>Broken cover plates</td>
</tr>
<tr>
<td>Unit</td>
<td>Walls</td>
<td>Holes in tile</td>
</tr>
<tr>
<td>Unit</td>
<td>Walls</td>
<td>Peeling and needs paint</td>
</tr>
<tr>
<td>Building Exterior</td>
<td>Blocked entrance</td>
<td>Missing accessibility route</td>
</tr>
<tr>
<td>Building Exterior</td>
<td>Roofs</td>
<td>Damaged shingles</td>
</tr>
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How Does Making Improvements Apply to My PHA?

Real World Example: PHA XY123

*Maintenance Corrections* from FYE 2002-FYE 2003 are highlighted in yellow below:

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<tr>
<td>Unit</td>
<td>Doors</td>
<td>Fixed: damaged doors- cannot lock properly</td>
</tr>
<tr>
<td>Unit</td>
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<td>Missing fixture</td>
</tr>
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How Does Making Improvements Apply to My PHA?

Real World Example: PHA XY123

**Systemic Deficiencies** for FYE 2003

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**PHA Code**: XY123

**Designation**: High Performer

**FYE 6/30/03**

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<thead>
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<th>PHAS Indicator</th>
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<tr>
<td>Physical</td>
<td>25</td>
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<tr>
<td>Financial</td>
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<td>Management</td>
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</tr>
<tr>
<td>Resident</td>
<td>9</td>
</tr>
<tr>
<td><strong>PHAS Total Score</strong></td>
<td><strong>92</strong></td>
</tr>
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</table>
Does Fixing Deficiencies Really Impact My Score?

Real World Example on PHA XY123

YES !!!

Results:

- Increased PASS score by 92%, changing PHA’s PASS score from 13 to 25
- Overall PHAS score increased by 15% from 80 to 92
- Changed designation status from Substandard Physical to High Performer
Common Deficiencies

- **Site**
  - Alleviate tripping hazards on sidewalks or parking lots
  - Repair damaged fences and gates, including holes or gaps
  - Repair erosion or ruts in ground
Common Deficiencies

**Building Exterior:**

- Check doors that are damaged and cannot latch or lock properly
- Check for damaged sills
- Make sure all access/emergency egress exits are not blocked

*Damaged Window*

*Door Cannot Be Locked*

*Blocked Access*
Common Deficiencies

**Building Systems:**
- Repair misaligned ventilation systems
- Repair leaking water
- Replace missing interior electrical panel covers

Leaking Central Water

Missing Electrical Panel Cover

Misaligned Ventilation System/Chimney
Common Deficiencies

**Common Areas:**
- Repair holes or missing tiles
- Create adequate size trash dispensers and dispose of trash regularly

**Missing Ceiling Tiles**

**Inadequate Trash Dispenser**
Common Deficiencies

**Units:**

- Ensure that there is adequate hot and cold running water
- Ensure that there is adequate supply of potable water
- Alleviate unsanitary facilities that are not in working condition, unusable in privacy, and have inadequate disposal of waste
- Fix inoperable smoke detectors
  - Each unit must have at least one smoke detector on each level (for example, in a 2 floor unit, there must be 2)
  - If 2 or more smoke detectors are on the same level in visible proximity, at least one of the smoke detectors must function as it should.

➤ **Remember:** Change batteries in smoke detectors often!
Common Deficiencies

- **Health and Safety:**
  - Repair exposed wires
  - Alleviate blocked exits and entrances
  - Fumigate properties often to eliminate infestation of insects

Exposed Wires
PASS Timeline

- **PHA should update PIC data**
  - 4-5 months prior to FYE

- **PASS Inspection time and date sent to PHA via mail**
  - ~4 months prior to FYE

- **Inspector confirms time and date via a phone call**
  - ~4 months prior to FYE

- **2nd confirmation letter sent to PHA**
  - 10 days months prior to inspection

- **~3 months prior to FYE**

**PASS Inspection**

- Inspector leaves EHS notice with property immediately after inspection
- PHA has 24 hours to alleviate EHS defects

**2nd confirmation letter sent to PHA**

- ~3 months prior to FYE

**PHA should update PIC data**

- 4-5 months prior to FYE

**PASS Inspection time and date sent to PHA via mail**

- ~4 months prior to FYE

**Inspector confirms time and date via a phone call**

- ~4 months prior to FYE

**2nd confirmation letter sent to PHA**

- 10 days months prior to inspection

**~3 months prior to FYE**
Inspections

- 4 months prior to inspection and fiscal year end double-check unit count and addresses in PIC
- Inspection occurs approximately 3 months prior to PHAs FYE
- PHA representative should accompany the inspector for the inspection
- Inspector will leave EHS Notice with the property
- PHA needs to correct EHS life-threatening violations within 24 hours and must report corrections to HUD Field Office within 3 business days
- Inspection results will be posted on the HUD web through Secure Systems for the PHA to review

⚠️ Deficiencies are recorded at the time of inspection; any deficiencies corrected after the inspection do not effect the score
Did You Remember To…. 

- Check for missing, damaged, or expired fire extinguishers?
- Replace open fuse ports?
- Ensure there is an interior electrical cover for the A/C unit boxes?
- Make sure the HVAC hot water heater pressure relief valve discharge tube is no more than 18 inches to the floor?
- Check roof for non-operable exhaust vents or damaged shingles?
- Check walls for damage, mold/mildew, holes, or the need for a new coat of paint?
- Check doors to ensure the seals are not damaged, that there is not dual side key locks, and that interior doors can close properly?
- Replace damaged stoves or ovens that do not work?
- Repair leaking pipes and damaged sinks/showers?
- Ensure that there is proper ventilation to exterior from the laundry rooms?

Check date card on fire extinguisher.
What does the score mean to the PHA?

24 or above – PHA is instructed to make required repairs as part of ongoing maintenance program, not inspected next year unless otherwise troubled (PASS Incentive)

18 to 24 – property is inspected next year but is not troubled based on physical score.

17 or below – PHA is considered troubled based on physical score.
Can a PHA challenge its physical inspection score?

No, the system creates the score based on data input.

However, if an *objectively verifiable* and *material error(s)* occurred in the inspection that, if corrected, will result in an improvement in the property's overall score, the PHA can request a Technical Review, or Database Adjustment.
What material errors justify a Technical Review?

**Building Data** - inspection includes the wrong building or a building that is not owned by the property

**Unit Count** - total number of units considered in scoring is incorrect as reported at the time of the inspection

**Non-Existent Deficiency** - deficiency that did not exist at the time of the inspection
What Does NOT Qualify for a Technical Review?

PIH-REAC will not consider

- disagreements over severity of defect, such as deficiencies rated Level 3 that the PHA thinks should be rated Level 1;
- deficiencies repaired or corrected during or after inspection; or
- items addressed by the Database Adjustment process
What material errors justify a Database Adjustment?

- inconsistencies between local code and REAC protocol
- PHA issues - items the PHA does not own, is not responsible for maintaining, and the PHA has notified the proper authorities regarding the deficient structure;
- adverse conditions beyond the owner's control, such as damage from a natural disaster or third party; and
- modernization work in progress
What must be included in a request for TR or DBA?

All property identification – property name, property identification number, Inspection Summary Report number, and specific information relevant to the request.

All location information for each deficiency presented in the request for review – inspectable area, building number, unit number, etc.
What else?

Written material to support the request

Photographs

Videos

Address general comments regarding the technical review request and requests for database adjustment in separate correspondence
Is there a suggested TR/DBA request format?

What is the timeframe for a PHA to submit such a request?

Requests must be submitted to REAC within 15 days following REAC's submission of the inspection report to the PHA.
What will be the result of a review?

If REAC determines that an *objectively verifiable* and *material error* has been documented, REAC may take one or more of the following actions:

- Conduct a new inspection
- Correct the physical inspection report
- Issue a corrected physical condition score
- Issue a corrected PHAS score
PASS Contacts

For questions concerning PASS or REAC, please call (toll-free) our Technical Assistance Center (TAC) at:

1 (888) 245-4860
(7:00 a.m. to 8:30 p.m., Eastern Standard Time)

For questions concerning UPCS Inspection Training, feel free to email the Inspection Training Team at:

REAC_PASS_Training@hud.gov
Other PASS Resources

Physical Inspection:
http://www.hud.gov/offices/reac/products/prodpass.cfm

Physical inspection Summary Report (Version 2.3):

Technical Reviews/Database Adjustment:
http://www.hud.gov/offices/reac/products/pass/pass_guideandrule.cfm

Overview of the Scoring Process:
http://www.hud.gov/offices/reac/products/pass/pass_doc.cfm