




U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-8000

OFFICE OF HOUSING

OCT 31 2014

MEMORANDUM FOR: Multifamily Senior Team
Multifamily Leadership Team
Multifamily Hub/Regional Center Directors
Multifamily Satellite Office Coordinators
Multifamily Operations Officers
Multifamily Extended Policy Team

FROM: 
Benjamin T. Metcalf, Deputy Assistant Secretary,
for Multifamily Housing Programs, HT

SUBJECT: Office of Multifamily Housing Programs Policy on Emergency Call Systems in Elderly Properties

PART 1: BACKGROUND

Owners, sponsors, and stakeholder groups have reported inconsistent guidance on which types of emergency call systems are required for elderly Multifamily properties, with reports that HUD staff have specifically instructed properties to maintain pull-cord technology in elderly properties rather than replacing this outdated technology with wireless or electronic emergency call systems.

This memo is intended to clarify Multifamily policy related to emergency call systems in elderly properties by describing the functional requirements of an emergency call system and explaining how those functional requirements can be met using a variety of manual, electronic, and wireless emergency alert systems.

PART 2: FUNCTIONAL REQUIREMENTS

There is no requirement that a property use a particular type of call system (such as older pull cord systems), as long as the system in place meets the functional requirements described in HUD Handbook 4910.1, Section 100-2.20.

HUD's Handbook 4910.1 *Minimum Property Standards for Housing, 1994 Edition*, specifies requirements for emergency call systems for elderly properties. Although this handbook was published before many electronic systems were available in the marketplace, it provides sufficient flexibility to accommodate electronic or wireless systems:

100-2.20 Emergency Call Systems

In projects containing 20 or more living units, each bathroom and one bed location in each living unit shall be furnished with one of the following emergency call systems: an emergency call system which registers a call (annunciator and alarm) at one or more central supervised locations, an intercommunicating telephone system connected to a switchboard which is monitored 24 hours a day, or an emergency call system which sounds an alarm (not the fire alarm) in the immediate corridor and automatically actuates a visual signal in the corridor at the living unit entrance.

Terms such as a “call”, “switchboard”, and “system” should be construed broadly to include both wired and wireless or electronic systems.

A “central supervised location” or “switchboard” can be either onsite or offsite, so long as the emergency calls are continuously monitored to ensure a timely response to a tenant’s emergency call.

The owner is required to provide and maintain the emergency call system, including any required repairs or replacement. This includes any battery replacements. It is unacceptable to have a separate add-on rental fee, but the cost for such a system is part of the project’s expenses and is expected to be covered within the monthly rental charge. Lost or tenant caused damaged equipment can be charged to tenants similar to other property damage charges.

If an existing pull cord system is installed on the property, Owners are permitted to replace that system with a wireless or electronic system as long as the new system is economical and meets the functional requirements described in Handbook 4910.1. If no longer in use, pull cords must be removed from each applicable unit.

PART 3: MOBILE EMERGENCY RESPONSE DEVICES

In addition, mobile personal emergency response devices that are worn on a tenant’s person shall also be acceptable, so long as the owner is able to provide ongoing assurance that the devices are operational and available for use by tenants and other household members.

The owner is required to have an Operation and Maintenance (O&M) Plan for mobile emergency response devices. The O&M Plan is to outline how the system will remain operational, maintained and replaced for the life of the project. Tenants shall be given written information regarding their devices, and what procedures they are to follow regarding repairs and/or replacement. This information is to be posted on a tenant information board or provided to the tenants on an annual basis.

PART 4: SUMMARY OF CLARIFICATION

An emergency response system, including mobile response devices, in elderly Multifamily properties shall be deemed acceptable if:

- The system registers an alarm call at a central supervised location; OR
- The system provides an intercommunication system that connects to a continuously monitored switchboard (24 hours a day); OR
- The system sounds an alarm in the immediate corridor and actuates a visual signal at the living unit entrance.

AND

- The system is available in each bathroom and one bed location in each living unit.

If you have any questions and/or concerns, please contact Brendan B. McTaggart at (202) 402-2047 or brendan.b.mctaggart@hud.gov.