

“Preparing for REAC Inspections” (Guidance for MultiFamily and Public Housing Properties)

We at REAC are providing the following guidance to assist you as the Property Owner/Agent or Public Housing Authority in preparing your property for the upcoming REAC inspection(s).

PREPARING FOR A REAC INSPECTION:

Prior to the REAC inspection date the property should conduct a complete (100%) inspection of the property. It should include the site, all building exteriors, all building systems, all common areas and all units. For clarification purposes: all areas within a building that are not residential units are considered common areas for the REAC inspection and you will need to provide access to each of these areas.

- The “Pre-REAC” inspection can be completed using the 2.3 public version of the inspection software, which is available for download from the REAC website, <http://www.hud.gov/offices/react/products/pass/software.cfm>, if you choose to complete the inspection electronically.
- If you prefer to complete it manually (on paper) there is a formatted inspection form available that allows you to inspect all the inspectable items, but it does not have the definitions readily available for each of the deficiencies. However, using this form allows you to enter the level and then check the accuracy of the findings after returning to the office or completing the inspection. The URL for this document is: <http://www.hud.gov/offices/react/products/pass/materials.cfm>.
 - While conducting the “Pre-REAC” inspection keep in mind that if an inspectable item exists on your property it must function as designed by the manufacturer.
 - The REAC inspection is a hands-on inspection. Whether the property staff or contract inspector conduct’s the “Pre-REAC” they must physically test the function of all windows, doors, fixed lighting, stoves, etc. You will not be able to accurately determine if the inspectable item(s) functions properly without first checking the operation, (i.e. if a door is designed to latch/lock, then the door should latch/lock.) However, if whoever is conducting the “Pre-REAC” inspection fails to check the door for both these functions it would be recorded as a defect on the REAC inspection if that area/item were selected in the sample.
- In addition to the “Top 20 Deficiencies” which can be found at: <http://www.hud.gov/offices/react/products/pass/materials.cfm>, special attention should be directed at any possible “Exigent Health & Safety” deficiency that may be found. They are:
 - Propane, natural, or methane gas leaks
 - Exposed wires or open electrical panels
 - Water leaks on or near electrical equipment
 - Blocked or unusable emergency or fire exits
 - Blocked fire escapes or ladders
 - Missing or misaligned chimney for gas-fired water heater or HVAC unit
 - Window security bars preventing exit
 - Expired fire extinguishers
 - Inoperative or missing smoke detectors

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- Property staff should adhere to the following when preparing for the REAC inspection:

Electrical:

- All electrical boxes, electrical panel boxes, fuse boxes, disconnect boxes, timer boxes, etc., are subject to inspection by the REAC inspector regardless of the location. These boxes will be inspected even if behind locked doors for any electrical deficiency that exists.
- All electrical panels and fuse boxes must be made available for inspection whether located inside or outside and secured or unsecured.
- All other electrical boxes, disconnects, timers, etc. will not be opened by the REAC inspector and no deficiency cited if secured at the time of the inspection. A box is considered secured by REAC definition if it can not be opened using only your hands. (No tools are allowed.)

Blocked Egress:

- All individual living areas/rooms in a unit and all common area rooms must have 2 independent and unimpeded means of egress (escape) if so designed. The only exception is windows above the 3rd floor that do not serve as a means of access to a designed escape route. *In cases where local code differs with this standard, either a letter from a local code official or a copy of the code should be provided/submitted within the guidelines of the TR/DBA process so that applicable lost points can be restored.*

ON THE DAY OF THE INSPECTION HAVE THE FOLLOWING INFORMATION AVAILABLE FOR THE INSPECTOR:

- Certificates (if applicable) for: Boilers, Fire Alarm, Building Sprinkler System, Elevator and Lead Based Paint Report and Resident Disclosure if the property has a building built prior to 1978.
- Area Measures: Parking Lots / Driveways / Roads (square footage) and Walkways / Steps (square footage).
- Rent Roll: Should be current for the day of inspection and must contain all occupied units, vacant units and non-revenue units. If the purpose of any of these dwelling units changes to a non-dwelling use you will need to inform the inspector and it must be removed from the unit count. (e.g. Office, Police Substation, etc.)
- Site map: (If available) This enables the inspector to navigate the property in a more efficient manner.

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IMPORTANT POINTS TO REMEMBER:

- When the inspector contacts you to schedule the inspection it must be a **mutually agreeable** time/date. (The inspection should take place during normal business hours of course.)
- You should not schedule the maintenance/service of any of the inspectable items the day of the inspection, i.e. elevators – “Out of Order” due to planned maintenance will be cited for a level 3 deficiency.
- If property staff or contractors have work in progress or have recently completed work that required the removal of panel covers exposing electrical wiring/connections, outlet/switch plate covers, etc. you will need to ensure that these items have been properly re-installed.
- Carry a notepad and camera with you during the REAC inspection to document the various findings when appropriate.
- The property staff is required to provide the inspector with access to all inspectable areas within the sample units and sample building common areas.
- You are allowed to do the following during the inspection:
 - In a unit or common area you may install a light bulb to demonstrate that a fixture functions properly, if so, it is not a defect.
 - If a pilot is out on two or more burners you may light the pilot and test the burners. If they both function, a Level 1 deficiency is recorded in lieu of a Level 3.
 - If the exhaust fan in the bathroom has been unplugged you may plug the exhaust fan in and if it functions properly there is no deficiency recorded.

SUPPLEMENTAL GUIDANCE:

The “Compilation Bulletin” and Inspector Notices are clarifications of the definitions and take priority over the written definitions in the inspection 2.3 software. The “Inspector Business Rules” detail the protocol for conducting the REAC inspection. You will need to familiarize yourself with these documents:

Compilation Bulletin URL:

http://www.hud.gov/offices/reac/products/pass/pass_bulletin.cfm

Inspector Notices URL:

http://www.hud.gov/offices/reac/products/pass/pass_doc.cfm

Inspector Business Rules URL:

http://www.hud.gov/offices/reac/products/pass/PDFs/i_a_business_rule.pdf