



OFFICE *of*
INSPECTOR GENERAL
★ ★ ★ ★
UNITED STATES DEPARTMENT OF
HOUSING AND URBAN DEVELOPMENT

HUD Can Improve Its Oversight of the Physical Condition of Public Housing Developments

Audit Report Number: 2023-CH-0004

May 30, 2023

To: Dominique G. Blom
General Deputy Assistant Secretary for Public and Indian Housing, P

//signed//
From: Kilah S. White
Assistant Inspector General for Audit, Office of Inspector General, GA

Subject: HUD Can Improve Its Oversight of the Physical Condition of Public Housing Developments

Attached is the U.S. Department of Housing and Urban Development (HUD), Office of Inspector General's (OIG) final results of our audit of HUD's oversight of the physical condition of public housing developments.

HUD Handbook 2000.06, REV-4, sets specific timeframes for management decisions on recommended corrective actions. For each recommendation without a management decision, please respond and provide status reports in accordance with the HUD Handbook. Please furnish us copies of any correspondence or directives issued because of the audit.

The Inspector General Act, as amended, requires that OIG post its reports on the OIG website. Accordingly, this report will be posted at <https://www.hudoig.gov>.

If you have any questions or comments about this report, please do not hesitate to call Kelly Anderson, Audit Director, at (312) 913-8499.

Highlights

HUD Can Improve Its Oversight of the Physical Condition of Public Housing Developments | 2023-CH-0004

What We Audited and Why

We audited the U.S. Department of Housing and Urban Development's (HUD) oversight of the physical condition of public housing developments. Our audit objective was to assess HUD's oversight of the physical condition of public housing developments; specifically, whether HUD had adequate oversight of public housing agencies' (PHA) (1) corrective actions in response to periodic Real Estate Assessment Center (REAC) inspections and (2) annual self-inspections to ensure that units were maintained in decent, safe, and sanitary condition.


What We Found

Properties receiving assistance through HUD's public housing program are periodically inspected by a HUD contractor using standards established by REAC. These "REAC inspections" evaluate five areas of a public housing development: site, building exterior, building systems, common areas, and dwelling units. If deficiencies in these areas are identified, the inspector records their severity within one of the following four categories: (1) no health and safety hazards, (2) non-life-threatening health and safety, (3) life-threatening exigent health and safety, or (4) fire safety. HUD requires public housing agencies (PHA) to address life-threatening exigent health and safety and fire safety smoke detector deficiencies identified during REAC inspections within 24-hours. HUD monitors PHAs' corrections of life-threatening deficiencies.¹

We found that HUD field offices were inconsistent in overseeing whether PHAs corrected life-threatening deficiencies identified during REAC inspections. In addition, HUD does not track PHAs' corrections of non-life-threatening health and safety deficiencies identified during REAC inspections. These conditions occurred because HUD did not have a standardized policy or a nationwide protocol to guide its field offices' oversight of PHAs to ensure that all health and safety deficiencies were corrected after a REAC inspection. Instead, HUD relied on its field offices to maintain their own policies and procedures for monitoring PHAs' unit conditions. However, the field offices generally did not maintain their own written policies and procedures, resulting in inconsistencies regarding what should be done. As a result, HUD lacked assurance that PHAs corrected identified life-threatening and non-life-threatening deficiencies. If HUD implements a nationwide protocol for monitoring and tracking PHAs' efforts to address inspection results, it could have greater assurance that tenants residing in public housing are living in units that are decent, safe, and sanitary.

In addition to the REAC inspection, HUD requires PHAs to perform routine self-inspections of public housing properties. These self-inspections include an annual visual assessment of the property to look for all deficiencies, and to determine the maintenance and modernization needs of the properties. We found that HUD staff had varying interpretations of its requirements regarding the number of public

¹ See the Background section of this report for additional details.



housing units PHAs should self-inspect annually. Further, HUD's field office staff generally did not monitor PHAs for compliance with HUD's requirements for self-inspections. These conditions occurred because HUD's guidance was not clear regarding (1) the number of units PHAs should inspect annually and (2) how its field office staff should monitor PHAs to ensure that self-inspections of public housing units were conducted. Without clear guidance regarding its requirements for self-inspections, HUD lacked assurance that PHAs properly performed self-inspections of public housing units to determine maintenance and modernization needs. HUD could also miss opportunities to provide technical assistance to PHAs through early intervention when self-inspections identify systemic deficiencies. Further, because REAC's inspection sampling methodology to select between 1 and 27 public housing units is based on the expectation that PHAs are completing self-inspections of 100 percent of their public housing units, REACs' sampling methodology may no longer be appropriate.

What We Recommend

We recommend that HUD develop and implement a nationwide inspection review protocol and associated training for its field office staff; determine whether PHAs are required to perform inspections on 100 percent of their public housing units annually; and if so, develop clear, specific guidance on the number and frequency of the self-inspections. If 100 percent annual self-inspections are not required, we recommend that HUD determine whether the rationale for REAC to inspect a sample of public housing units, rather than 100 percent, remains appropriate.

Table of Contents

Background and Objectives	1
Results of Audit	3
HUD Did Not Consistently Oversee PHAs’ Corrections of Inspection Deficiencies.....	3
HUD’s Requirements for PHA Self-Inspections of Public Housing Units Are Unclear, and HUD Can Enhance Its Monitoring of PHAs’ Self-Inspections.....	8
Scope and Methodology	12
Appendixes	14
Appendix A – Auditee Comments and OIG’s Evaluation	14
Appendix B – Federal Regulations and Other Requirements	17
Appendix C – Sampling Results	20

Background and Objectives

Properties receiving assistance through the U.S. Department of Housing and Urban Development's (HUD) public housing program must be inspected according to HUD's Real Estate Assessment Center's (REAC) Uniform Physical Condition Standards (UPCS), which are defined in 24 CFR (Code of Federal Regulations), Subtitle A, Part 5, Subpart G. These standards were developed in 1998 to ensure uniformity and objectivity in assessing the physical conditions of HUD-assisted or -insured properties. These standards outline a framework to ensure that the condition of taxpayer-supported housing is decent, safe, sanitary, and in good repair. The UPCS score ranges from 0 to 100 points and is used to assess a property's overall physical condition. A property that receives a score below 60 points has failed the inspection.

REAC inspections evaluate five areas of a public housing development: site, building exterior, building systems, common areas, and dwelling units. If deficiencies in these areas are identified, the inspector records their severity within one of the following four categories: (1) no health and safety hazards, (2) non-life-threatening health and safety, (3) life-threatening exigent health and safety, or (4) fire safety. All data obtained during the inspection are electronically transferred to REAC to (1) perform quality assurance measures on the raw data, (2) ensure that the data transmission was complete, and (3) verify certain information about the development. REAC then scores the data and provides an inspection report electronically to the public housing agency (PHA) and the Office of Public and Indian Housing's (PIH) relevant program field office.

When life-threatening exigent health and safety and fire safety smoke detector ("life-threatening") deficiencies are identified during an inspection,² the HUD-contracted inspector (1) immediately notes the deficiencies on a notification form, (2) requires the PHA representative to sign the form, and (3) provides a copy of the form on site to the PHA's representative. The inspector then transmits the notification form to REAC. The PHA is responsible for correcting life-threatening deficiencies within 24 hours of receiving the notification form.³ PHAs are also required to correct, remedy, or act to abate health and safety (non-life-threatening) deficiencies promptly after receiving the final physical inspection report from REAC.

PIH's Office of Field Operations (OFO) provides guidance and oversight for the 45 PIH field offices. These field offices serve as primary points of contact for PHAs, public housing residents, applicants, and interested parties. The field offices also provide PHAs technical assistance and monitor and evaluate their performance.

HUD's Physical Assessment Subsystem (PASS) allows users to perform tasks, view data, and gather information related to onsite physical inspections and assessments of HUD-assisted properties. Inspectors record the results of their inspection and upload the results into PASS. HUD's REAC staff processes, reviews, scores, and releases the inspection data. For the public housing program, PHAs use a module in PASS to review and certify that each life-threatening deficiency has been corrected within 3 business days of receiving the notification form. After a PHA certifies that a life-threatening deficiency

² HUD treats both life-threatening exigent health and safety and fire safety smoke detector deficiencies as 24-hour deficiencies. For purposes of this report, each time we use the term "life-threatening," we are referring to both life-threatening exigent health and safety and fire safety smoke detector deficiencies.

³ 24 CFR 902.22(f)(1)

was corrected, the responsible field office staff reviews each certification and makes a final decision of “acceptance” or “incomplete” for the corrective action.⁴

As shown in table 1 below, 32,968 life-threatening deficiencies were reported in 5,199 REAC inspection reports from October 23, 2012, to December 7, 2021. PHAs did not certify 5,052 (15 percent)⁵ identified deficiencies as corrected. Of those they certified, HUD marked only 3,657 (13 percent)⁶ as reviewed.

Table 1. Life-threatening deficiencies identified, corrected, and reviewed in HUD’s PASS

Category	Identified deficiencies	Deficiencies certified as corrected	Deficiencies not certified as corrected	Deficiency correction certifications reviewed by HUD
Life-threatening exigent health and safety	23,376	19,655	3,721	2,418
Fire safety	9,592	8,261	1,331	1,239
Totals	32,968	27,916	5,052	3,657

Source: OIG analysis of data provided by HUD from PASS

In addition to the REAC inspection, PHA property managers perform routine self-inspections of public housing properties. These self-inspections include an annual visual assessment of the property to look for all deficiencies and determine maintenance and modernization needs. Because it is REAC’s expectation that PHAs are completing self-inspections, HUD uses a statistically valid random sampling methodology to select between 1 and 27 public housing units to inspect, rather than having REAC inspectors inspect 100 percent of the units.

HUD launched a wholesale reexamination of REAC’s inspection process and in 2019 began testing and implementing the National Standards for the Physical Inspection of Real Estate (NSPIRE) demonstration. The goal of the NSPIRE demonstration was to design a new simplified inspection system that would more accurately reflect the physical conditions within housing units and to place a greater emphasis on reducing health and safety hazards. NSPIRE’s focus is on the areas that impact residents. Under NSPIRE, properties will no longer pass their overall inspection if the unit inspectable area fails.

Our audit objective was to assess HUD’s oversight of the physical condition of public housing developments. Specifically, we wanted to determine whether HUD had adequate oversight of PHAs’ (1) corrective actions in response to periodic REAC inspections and (2) annual self-inspections to ensure that units were maintained in decent, safe, and sanitary condition.

⁴ PASS Record and Process Inspection Data (RAPID) 4.0 User Manual, Figure 5: The EHS work-flow process

⁵ 5,052/32,968

⁶ 3,657/27,916

Results of Audit

HUD Did Not Consistently Oversee PHAs' Corrections of Inspection Deficiencies

Although HUD requires PHAs to address life-threatening deficiencies within 24-hours, HUD field offices were inconsistent in overseeing that those deficiencies were corrected. In addition, HUD does not track PHAs' corrections of non-life-threatening deficiencies. These conditions occurred because HUD did not have a standardized policy or a nationwide protocol to guide its field offices' oversight of PHAs to ensure that all life-threatening and non-life-threatening deficiencies identified during REAC inspections were corrected. Instead, HUD relied on its field offices to maintain their own policies and procedures for monitoring PHAs' unit conditions. However, the field offices generally did not maintain their own written policies and procedures, resulting in inconsistencies regarding what should be done. As a result, HUD lacked assurance that PHAs corrected identified life-threatening and non-life-threatening deficiencies. If HUD implements a nationwide protocol for monitoring and tracking PHAs' efforts to address inspection results, it could have greater assurance that tenants residing in public housing are living in units that are decent, safe, and sanitary.

HUD Did Not Consistently Monitor PHAs' Corrections of Life-Threatening Deficiencies

HUD requires that PHAs correct identified life-threatening deficiencies within 24 hours and certify within 3 business days that the deficiencies have been corrected.⁷ HUD's followup with the PHAs to determine whether life-threatening deficiencies have been certified as corrected included, in part, field office staff's marking the certifications as reviewed in PASS.⁸ However, HUD's field offices did not consistently review the PHAs' certifications or verify that corrections had been made.

We reviewed a targeted random sample of REAC inspections of 76 public housing properties that were completed during calendar year 2019. These inspections took place within the jurisdictions of 44 of HUD's 45 field offices. We also interviewed staff in all 45 field offices to assess their process for monitoring PHAs' corrections of deficiencies after a REAC inspection.

Inconsistent Certification Reviews

Of 706 life-threatening deficiencies identified across the 76 inspections reviewed,⁹ 161 life-threatening deficiencies for 12 inspections had not been certified by PHAs as corrected, including deficiencies such as missing or inoperable smoke detectors, exposed electrical wires, and missing or misaligned chimneys, resulting in potential carbon monoxide hazards. PHAs had certified the remaining 545 life-threatening deficiencies in 64 inspection reports as corrected in PASS as required. However, the relevant field offices marked only 70 life-threatening deficiencies related to 14 inspections as reviewed. Of the 14 inspections, 3, containing 22 life-threatening certifications, were marked as reviewed after we sent our request for information to the field offices, which was nearly 3 years after the deficiencies had been identified. The

⁷ 24 CFR 902.22(f)(1)

⁸ HUD's Physical Assessment Subsystem Record and Process Inspection Data (RAPID) 4.0 User Manual

⁹ See appendix C for the results of our reviews.

remaining 50 inspections requiring 453 life-threatening certifications were not marked as reviewed by HUD in PASS.

Field offices provided several reasons why they did not consistently review PHA certifications to determine whether life-threatening deficiencies had been marked as corrected in PASS.

Technical issues accessing PASS	Twenty-two field offices noted technical issues with being able to access PASS, which prevented them from reviewing the inspection data.
Onsite verifications necessary	Three field offices noted that in-person onsite verifications were necessary to mark the certifications as reviewed. Thirteen field offices expressed concern about whether marking PHAs' certifications as reviewed, without an onsite verification, would make the office liable if a PHA did not correct a life-threatening deficiency and a household was injured as a result.
Certification reviews not required	Two field offices stated that HUD does not require certifications to be marked as reviewed in PASS.

Inconsistent Correction Verification

The field offices' methods for verifying that PHAs addressed life-threatening deficiencies were not consistent. To verify that the corrections had been made, 21 of 39 field offices¹⁰ stated that they requested documentation from the PHAs to support that the 172 life-threatening deficiencies for 30 of 62 inspections had been corrected. However, support for only 139 life-threatening deficiencies across 25 inspections were provided upon request. The remaining 18 field offices said that they did not request documentation to verify that the 450 life-threatening deficiencies had been corrected for 32 inspections.

We noted several reasons why field offices did not consistently verify that life-threatening deficiencies had been corrected.

¹⁰ We initially selected 76 inspections, containing 706 life-threatening deficiencies, to review across 44 field offices; however, 5 field offices did not respond to our requests for information regarding 14 inspection reports, containing 84 life-threatening deficiencies. Therefore, only 39 of the 44 field HUD offices responded to our requests for documentation. The inspections for 62 of the 76 inspections reviewed were in the jurisdictions of the 39 field offices. See the Scope and Methodology section of this report for more information.

Deficiencies easy to fix	Two field offices noted that some life-threatening deficiencies were easy to correct so they did not feel the need to confirm that those deficiencies had been addressed.
Low number of deficiencies	Two field offices stated that they did not need to verify that life-threatening deficiencies had been addressed when there were not many identified during an inspection.
Positive perception of PHA	Six field offices stated that they did not verify that life-threatening deficiencies had been corrected if the responsible PHA was seen as a high performer, responsive, or otherwise had a good working relationship with the office.
Verification not required	Four field offices noted that HUD does not require verification of life-threatening deficiency corrections in PASS.

Although the field offices provided various reasons for not consistently verifying that the life-threatening deficiencies had been corrected, they did not have policies and procedures to address how or when those verifications should be performed.

In addition, 15 field offices asked for a reporting mechanism or space within PASS or any future system to allow PHAs to upload documentation (such as photos, work orders, receipts, etc.) to support their correction of physical deficiencies. Eight field offices also expressed interest in nationwide deficiency-tracking and communication logs for the correction of deficiencies, with entries maintained by each field office.

Thirteen field offices suggested the need for training to better understand (1) who is responsible for reviewing or following up with PHAs about the correction of life-threatening deficiencies, (2) how to review the physical inspection reports to effectively ensure that PHAs are correcting physical deficiencies, or (3) how a PHA can address or correct each type of deficiency observed in the inspection report (for example, which deficiencies can be fixed by general maintenance staff, which would require a licensed professional, and descriptions of the type of documentation to obtain from the PHA to support that the work was completed).

According to the Director of OFO's Coordination and Compliance Division, HUD does not have a standardized policy or nationwide protocol to guide how its field offices should conduct oversight of PHAs' unit conditions because each office should have its own policies and procedures. However, when we interviewed management and staff from the 45 program field offices, we determined that the offices generally did not maintain written policies and procedures for monitoring PHAs' correction of life-threatening deficiencies within 24 hours or verifying PHAs' certifications that those deficiencies had been corrected in PASS within 3 business days. As a result, the methods used among field office staff varied.

When asked, 28 of the 40¹¹ field offices expressed interest in standardized policies and procedures, which may include standard instructions for field office communication with PHAs as well as HUD's expectation

¹¹ Although we requested documentation from 44 field offices, only 40 responded to our followup questions about additional guidance or resources that the field offices believed would be helpful to review PHAs' corrections of deficiencies identified during REAC inspections.

for documentation to ensure that REAC physical inspection deficiencies (including both life-threatening and non-life-threatening) are corrected.

HUD Does Not Track PHAs' Corrections of Non-Life-Threatening Deficiencies

Although HUD requires PHAs to promptly correct non-life-threatening deficiencies, they are not required to certify that these deficiencies have been corrected in PASS. Therefore, unlike life-threatening deficiencies, HUD does not track and monitor the correction of non-life-threatening deficiencies, which include deficiencies such as cracked or missing windowpanes, tripping hazards, and infestation. In addition, field office staff members indicated that they did not generally follow up or verify that those deficiencies had been corrected unless the PHAs were rated as substandard, substandard physical, or troubled under HUD's Public Housing Assessment Subsystem (PHAS).¹²

Despite the lack of a requirement to follow up, 13 of 39 field offices stated that they contacted PHAs on 14 of 62 inspections reviewed regarding 197 identified non-life-threatening deficiencies. However, they could support this followup for only 5 inspections containing 42 non-life-threatening deficiencies. The remaining 26 field offices stated that they did not follow up or communicate with PHAs for the other 48 inspections reviewed, which included 1,070 non-life-threatening deficiencies.

Additionally, 6 of 39 field offices said that they verified the correction of 109 non-life-threatening deficiencies for 8 inspections. However, only 1 field office was able to support this assertion for 1 inspection containing 16 non-life-threatening deficiencies. The remaining 33 field offices stated that they did not verify that PHAs corrected 1,158 non-life-threatening deficiencies for the remaining 54 inspections reviewed.

For non-life-threatening deficiencies, although HUD does not have a requirement for its field offices to track and monitor whether PHAs corrected non-life-threatening deficiencies, the field offices provided several reasons for not verifying non-life-threatening deficiencies, which were similar to the reasons noted above for not verifying life-threatening deficiencies. Additionally, 13 field offices identified the need for clear guidance on whether they should follow up on the correction of non-life-threatening deficiencies and if so, when.

As a result of HUD's not having consistent processes for its field offices to oversee PHAs' corrective actions for both life-threatening and non-life-threatening deficiencies, HUD lacked assurance that PHAs corrected the deficiencies, and tenants may have been exposed to units that were not decent, safe, and sanitary.

Conclusion

HUD field offices generally did not have a consistent process for ensuring that life-threatening deficiencies were corrected. In addition, HUD does not have a process for monitoring PHAs' corrections of non-life-threatening deficiencies. These conditions occurred because HUD's OFO did not have standardized policies or procedures for field offices to follow detailing how and when staff should follow up with PHAs to ensure that life-threatening and non-life-threatening deficiencies were corrected.

¹² PHAS is a system that HUD uses to assess a PHA's performance in managing its public housing programs.

Instead, it relied on the field offices to maintain their own policies and procedures related to monitoring PHAs' unit conditions. However, the field offices generally did not maintain their own written policies and procedures, resulting in inconsistencies regarding what should be done. As a result of HUD's not having consistent processes for its field offices to oversee PHAs' corrective actions for both life-threatening and non-life-threatening deficiencies, HUD lacked assurance that PHAs corrected the deficiencies. If HUD implements a nationwide protocol for monitoring and tracking PHAs' efforts to address inspection results, HUD could have greater assurance that tenants residing in public housing are living in units that are decent, safe, and sanitary.

Recommendations

We recommend that the Deputy Assistant Secretary for Field Operations¹³

- 1A Develop and implement a nationwide inspection review protocol, which includes but is not limited to (1) whether field office staff should mark verification of PHA corrections of life-threatening deficiencies in PASS or any future tracking systems, (2) acceptable documentation for offsite verifications, and (3) whether field office staff should discuss or verify corrections of non-life-threatening deficiencies.
- 1B Develop and implement training for field offices that addresses reviewing or following up with PHAs about the correction of life-threatening and non-life-threatening deficiencies and how (1) to review physical inspection reports to effectively ensure that PHAs correct physical deficiencies, (2) PHAs should address or correct each type of deficiency observed in the REAC physical inspection report, and (3) to use PASS or any future tracking system.
- 1C Implement a system to track field office inspection review activities and create a repository for the support documentation collected to verify the correction of life-threatening deficiencies.

¹³ In our recommendations, we use HUD's current language of life-threatening and non-life-threatening, but the recommendations would also apply to any language HUD uses to identify these deficiency types under its forthcoming NSPIRE inspection protocols or any other successor programs.

HUD's Requirements for PHA Self-Inspections of Public Housing Units Are Unclear, and HUD Can Enhance Its Monitoring of PHAs' Self-Inspections

HUD's oversight of PHAs' annual self-inspections includes establishing requirements for the self-inspections and monitoring whether those self-inspections occurred. However, HUD had varying interpretations of those requirements regarding the number of public housing units that PHAs should inspect annually. HUD's field office staff generally did not monitor PHAs for compliance with HUD's requirements for self-inspections. These conditions occurred because HUD's guidance was not clear regarding (1) the number of units that PHAs should inspect annually and (2) how its field office staff should monitor PHAs to ensure that self-inspections of public housing units were conducted. Without clear guidance regarding its requirements for self-inspections, HUD lacked assurance that PHAs properly performed self-inspections of public housing units to determine maintenance and modernization needs. HUD could also miss opportunities to provide technical assistance to PHAs through early intervention when self-inspections identify systemic deficiencies. Further, because REAC's inspection sampling methodology is based on the expectation that PHAs are completing self-inspections of 100 percent of their public housing units, REACs' sampling methodology may no longer be appropriate.

HUD's Requirements for PHAs To Complete Annual Self-Inspections of Public Housing Units Are Unclear

In 1998, Section 530 of the Quality Housing and Work Responsibility Act of 1998¹⁴ amended the U.S. Housing Act of 1937¹⁵ to require that each PHA that owns or operates public housing must make an annual inspection of each public housing development to determine whether units in the development are maintained in compliance with standards that meet or exceed the housing quality standards. HUD reinforced this statutory requirement in its guidance in a January 2000 Federal Register notice, which concluded that REAC should not inspect all units because that would be costly and PHAs are already required to inspect 100 percent of their units and systems.

However, during this audit, we determined that HUD staff had varying interpretations of the requirements regarding the number of unit inspections required.¹⁶ This was due in part to several changes made to HUD's guidance that created a lack of clarity among HUD staff and PHAs as to what was required. HUD's inconsistent interpretation regarding the number of public housing units that PHAs were required to inspect annually prevents its staff from ensuring that PHAs properly implemented the statutory requirement to perform these inspections.

In August 2008, HUD issued Federal Register Notice 73 FR 49544, proposing to remove the requirement for PHAs to submit a management operation certification, which included a certification that they completed inspections of 100 percent of their units annually. Then in February 2011, HUD issued Federal Register Notice 76 FR 10136, setting an interim rule removing the management and operations certifications as a scored element under PHAS. This change resulted in PHAs' no longer receiving a score for self-certifying the inspection of 100 percent of their units and systems under the PHAs. HUD issued a

¹⁴ Public Law 105-276, Title V (1998)

¹⁵ Section 1437d(f)(3)

¹⁶ See appendix B for more details on HUD's varying requirements for PHAs' annual self-inspections.

newsletter in January 2012, stating that a PHA's physical inspection of public housing units is no longer a component of the PHAS score. Since issuing the 2012 newsletter, HUD has not issued formal guidance regarding the number of self-inspections PHAs are required to conduct annually.

When interviewed during this audit, HUD's Deputy Assistant Secretary for REAC acknowledged that HUD could have communicated the requirements better and said that when it issues the NSPIRE final rule, HUD would need to issue clear communication about the self-inspection requirements so that there would be no confusion about what was required. HUD's Director of Public Housing Programs said that HUD needs to improve its communication regarding its requirements for self-inspections so that they are clear and consistent among its various program offices.

Further, staff in OFO's Coordination and Compliance Division said that the public housing self-inspection requirement is an unclear requirement that should be revisited. The staff also said that HUD has had different interpretations over the years as to whether this policy requires inspections of 100 percent of the public housing units. Additionally, the staff told us that HUD was looking to clarify the requirements with the NSPIRE program because it had not been clear to PHAs. In a meeting with PIH's Office of Prevention, Recovery, and Transformation staff, a general engineer said that HUD had not issued formal notification to PHAs that they needed to continue to inspect 100 percent of their units; however, the NSPIRE program would clarify the requirements. The engineer also said that the NSPIRE interim rule stated that PHAs would be required to inspect 100 percent of their units. As a result of not having a consistent interpretation of the requirements for self-inspections, HUD lacked assurance that PHAs properly performed self-inspections of public housing units.

Additionally, HUD's REAC inspection sampling methodology is based on PHAs' inspecting 100 percent of their units annually.¹⁷ Therefore, HUD decided to use a statistically valid random sampling methodology, rather than having REAC inspectors inspect 100 percent of PHAs' public housing units. Under current UPCS protocols, REAC's inspection sample size is between approximately 1 and 27 units, based on the size of the development. Therefore, if a PHA does not complete self-inspections of all public housing units, a REAC inspection may review only approximately 27 units per development¹⁸ every 1 to 3 years.¹⁹ If HUD determines that PHAs are not required to inspect 100 percent of their units annually, REAC's methodology of inspecting a sample of units may no longer be appropriate.

HUD Generally Did Not Monitor PHAs' Self-Inspections

HUD generally did not monitor the self-inspections completed by PHAs. Of the 40 field offices²⁰ that responded regarding general monitoring practices, 16 stated that they generally reviewed and discussed

¹⁷ 65 FR 1712, issued January 11, 2000

¹⁸ A public housing development can consist of multiple properties.

¹⁹ For instance, for a property with 1,462 units, if REAC inspected 27 units every year, it would take approximately 54 years to inspect all of the units; however, with statistical sampling, there is no guarantee that every unit would be reviewed, because with each inspection, all units would have an equal probability of being selected for inspection.

²⁰ Although we requested documentation from 44 field offices, only 40 responded to our followup questions about general monitoring practices.

PHAs' annual self-inspections during compliance²¹ or monitoring reviews if (1) the PHA received a low REAC UPCS physical inspection score(s) or (2) the field office received multiple complaints about the development or PHA. However, the remaining 24 field offices stated that they did not generally review or discuss the PHAs' annual self-inspections due to one or more of the following reasons:

- 20 stated that it was the PHAs' responsibility to ensure that deficiencies observed during the PHAs' annual self-inspections were corrected within a reasonable amount of time;
- 11 stated that HUD does not require field offices to follow up on PHAs' self-inspections; and
- 5 stated that the PHA was a high performer, responsive, or had a good working relationship with the field office.

This condition occurred because OFO did not have standardized policies or procedures for field office staff to follow detailing how and when staff should monitor PHAs to ensure that annual self-inspections were conducted. HUD's field office staff generally believed that annual inspections of public housing units were the responsibility of the PHAs. In a meeting with PIH's Office of Prevention, Recovery, and Transformation staff, a general engineer clarified that the PHAs' annual self-inspections are meant for the PHAs to identify (1) deficiencies that need to be corrected in the units and (2) the maintenance and modernization needs of each development. As a result, HUD lacked assurance that public housing units were inspected to determine maintenance and modernization needs and that HUD had a true picture of the physical conditions of PHAs' public housing inventory. Further, HUD could also miss opportunities to provide technical assistance to PHAs through early intervention when their self-inspections identify systemic deficiencies.

Conclusion

After HUD made changes to PHAS, removing, in part, the requirement for PHAs to self-certify that 100 percent of their units had been inspected, HUD did not provide clear guidance regarding the number of units that PHAs should inspect annually. HUD also did not provide clear guidance for its field office staff to monitor PHAs' compliance with the inspection requirement outside PHAS. HUD's field office staff generally believed that annual inspections of public housing units were the responsibility of the PHAs. Without clear guidance regarding its requirements for self-inspections, HUD lacked assurance that PHAs properly performed self-inspections of public housing units to determine maintenance and modernization needs. HUD could also miss opportunities to provide technical assistance to PHAs through early intervention when self-inspections identify systemic deficiencies. Further, because REAC's inspection sampling methodology is based on the expectation that PHAs are completing self-inspections of 100 percent of their public housing units, REACs' sampling methodology may no longer be appropriate.

Recommendations

We recommend that the Deputy Assistant Secretary for REAC

- 2A Determine whether PHAs are required to perform annual inspections on 100 percent of their public housing units annually and issue clarifying guidance to all PHAs.

²¹ HUD field office staff performed an average of 27 compliance reviews per year between 2017 and 2020. OFO developed a national compliance checklist for field offices to use during their monitoring reviews. There were two questions related to physical conditions; however, neither question was related to PHAs' self-inspections.

- 2B If REAC determines that 100 percent annual self-inspections are required, establish specific guidance to address the number of units and frequency of PHA self-inspections. If not required, REAC should evaluate whether HUD’s rationale for inspecting a statistical sample rather than 100 percent of public housing units remains appropriate.²²

We recommend that the Deputy Assistant Secretary for Field Operations

- 2C Develop and implement a nationwide protocol for field offices, describing how PHA self-inspections should be reviewed, based on REAC’s determination of the number and frequency of PHA self-inspections.

²² In the U.S. Government Accountability Office’s (GAO) report, GAO 19-254, Real Estate Assessment Center: HUD Should Improve Physical Inspection Process and Oversight of Inspectors, issued March 21, 2019, recommendation 2 stated that the Deputy Assistant Secretary for REAC should resume calculating the sampling error associated with the physical inspection score for each property, identify what changes may be needed for HUD to use sampling error results, and consider those results when determining whether more frequent inspections or enforcement actions are needed. While GAO recommended that REAC resume calculating the sampling error, our recommendation 2B focuses on whether the inspection of a sampling of units would remain appropriate if HUD determines that PHAs do not need to complete self-inspections of 100 percent of their units.

Scope and Methodology

We conducted the audit from May through November 2022. All audit work was performed remotely, and all interviews and discussions were conducted virtually via Microsoft Teams. The audit covered the period January 1, 2017, through December 31, 2021.

To accomplish our audit objective, we

1. Reviewed the United States Housing Act of 1937 and other applicable public laws, Federal Register notices, CFRs, PIH housing notices, guidebooks, HUD's Physical Assessment Subsystem Record and Process Inspection Data (RAPID) User Manual, and newsletters.
2. Interviewed HUD management officials to gain an understanding of (1) differences in requirements for PHAs' annual self-inspections and (2) HUD field office responsibilities for monitoring PHAs' compliance with HUD's UPCS.
3. Interviewed and requested supporting documentation from HUD field offices to gain an understanding of the policies and procedures used for monitoring PHAs' (1) compliance with HUD's UPCS, (2) mitigation of life-threatening and non-life-threatening deficiencies identified in HUD's REAC inspection reports, and (3) annual self-inspections.
4. Obtained public housing physical inspection results data from HUD's REAC for the period October 23, 2012, to December 7, 2021.
5. Obtained copies of inspection reports, life-threatening deficiency notification forms, PHA certifications of life-threatening deficiency mitigation, and HUD field office reviews of those certifications from PASS.
6. Interviewed staff from 100 percent of the 45²³ HUD field offices, which had responsibility to monitor public housing, to discuss the activities performed after an individual PHA development's physical inspection was completed.

On January 11, 2022, we obtained the listing of the most recent physical inspection scores from REAC, which contained inspections from October 23, 2012, through as of December 7, 2021. Because we designed the criteria to select a nonstatistical sample, we used a targeted sampling approach; therefore, we cannot project the results of our sampling to the universe of inspections. We narrowed the scope for this part of our review to the 2,393 inspections that occurred during calendar year 2019 to be as current as possible before the coronavirus disease 2019 pandemic. From the 2,393 inspections, we determined that 1,237 had at least 1 life-threatening deficiency. Therefore, from HUD's inspection data, we created a subuniverse of all inspections occurring during 2019 that had 1 or more life-threatening deficiencies, which consisted of 1,237 inspections of public housing developments managed by 725 PHAs located within the 45 HUD field office jurisdictions. We then determined the number of inspections that occurred within each field office's jurisdiction. The number of inspections with life-threatening deficiencies for each field office within the parameters stated above ranged between 1 and 87 inspections for each field office as follows:

²³ We interviewed all 45 field offices. We requested followup information from 44 of the 45 field offices regarding inspections containing life-threatening and non-life-threatening deficiencies. Of the 44 field offices, 39 responded to our request for followup information. Additionally, in our request to the 44 field offices, we asked general questions about the field office reviews of PHA self-inspections. Of the 44 field offices, 40 responded to our general questions about field office reviews of PHA self-inspections.

- 1 inspection for followup for field offices with between 1 and 20 inspections,
- 2 inspections for field offices with between 21 and 40 inspections, and
- 3 inspections for field offices with between 41 and 87 inspections.

We randomly selected 76 inspections from 44 field offices to review as follows:²⁴

- 21 inspections from 7 field offices that had between 41 and 87 inspections,
- 36 inspections from 18 field offices that had between 21 and 40 inspections, and
- 19 inspections from 19 field offices that had between 2 and 20 inspections.

Therefore, we selected a targeted random sample of 76 inspections from 44 field offices. We asked specific questions and requested supporting documentation related to the field offices' monitoring activities related to PHAs' mitigation of life-threatening, non-life-threatening, and annual self-inspection deficiencies. We received responses from 39 field offices for 62 inspections, although in some cases, a field office did not respond to each question asked.

Of the 76 inspections from the 44 field offices, we received responses from 39 field offices for 62 inspections. Although we did not receive responses from 5 field offices for 14 inspections (18 percent), we believe that the evidence obtained was sufficient to reach our conclusions.

We conducted the audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objective(s). We believe that the evidence obtained provides a reasonable basis for our conclusions based on our objective.

²⁴ One field office had only one inspection, which did not get selected.

Appendixes

Appendix A – Auditee Comments and OIG’s Evaluation

Ref to OIG Evaluation – Auditee Comments



OFFICE OF PUBLIC AND INDIAN HOUSING

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

MEMORANDUM FOR: Kilah S. White, Assistant Inspector General for Audit, GA

ATTENTION: Kelly Anderson, Audit Director, Rental Assistance and Safe and Affordable Housing Audit Division, 5AGA

FROM: Ashley L. Sheriff, Deputy Assistant Secretary for the Real Estate Assessment Center, PX
Ashley L. Sheriff
Felicia Gaither, Deputy Assistant Secretary for the Office of Field Operations, PQ

SUBJECT: Comments on OIG Draft Audit, “HUD Can Improve Its Oversight of the Physical Condition of Public Housing Developments”

Comment 1 >

Thank you for the exit interview on April 13, 2023, and for the opportunity to provide comments on the subject draft audit report. As discussed in the meeting, HUD’s Real Estate Assessment Center (REAC) and Office of Field Operations (OFO) concur with the OIG’s recommendations on oversight of health and safety issues in public housing, the policy on self-inspections, and the lack of consistent protocols for field office oversight on these requirements.

Comment 2 >

While field office staff oversee closure of “exigent health and safety” (EH&S) deficiencies, REAC acknowledges that some of the issues with tracking EH&S deficiencies are related to an aging and sometimes unavailable system, and guidance on its use. Further, REAC could better clarify what is expected for mitigation of EH&S deficiencies for staff performing this work. To resolve the policy and system issues, HUD will soon publish updated physical condition standards and deficiency correction requirements under the National Standards for the Physical Inspection of Real Estate (NSPIRE) rulemaking. The NSPIRE standards, announced for public comment in June 2022, are expected to include an updated list of Life-Threatening (LT) and Severe conditions in public housing that will require correction in 24 hours. The NSPIRE rule also proposes to require that PHAs upload evidence of LT and Severe deficiencies within 72 hours. Once the NSPIRE Standards and final rule are effective, HUD field offices will use an updated tracking system and follow new procedures to ensure deficiencies are corrected within established timelines. The procedures for PHAs and field offices will be in the NSPIRE Administrative notice. REAC will also outline best practices for deficiency correction, including

www.hud.gov

espano@hud.gov

Ref to OIG Evaluation – Auditee Comments

2

blocking the hazard until permanent repairs are completed. HUD expects the NSPIRE Administrative notice will be published shortly after the final rule, but before it is effective on July 1, 2023.



Comment 3 >



Comment 4 >

In addition to new requirements for tracking and closing deficiencies identified in the REAC inspection, the NSPIRE final rule is expected to contain a regulatory requirement for self-inspections. The final regulation will clarify whether the inspection must be of all units, or whether sampling is allowed. The NSPIRE Administrative notice will include procedures for how/when PHAs will provide self-inspections to HUD. Finally, REAC and OFO will work on a training program for all elements of NSPIRE that will affect field offices, especially on correcting deficiencies and oversight of annual self-inspections.

We appreciate the OIG's engagement and thorough review of REAC and OFO's work to ensure decent, safe and sanitary public housing and look forward to working on management decisions.

OIG Evaluation of Auditee Comments

Comment 1	HUD's Real Estate Assessment Center (REAC) and Office of Field Operations (OFO) concurred with the recommendations in this report. We acknowledge HUD's agreement and look forward to working with HUD to resolve the audit report recommendations.
Comment 2	We acknowledge HUD's commitment to improving its oversight, tracking, and expectations for documentation to demonstrate that PHA's mitigated life-threatening deficiencies identified during REAC UPCS inspections. HUD stated that soon it will publish updated physical condition standards and deficiency correction requirements under the National Standards for the Inspection of Real Estate (NSPIRE) rulemaking. Once the NSPIRE Standards and final rule are effective HUD intends to publish an administrative notice that will outline procedures for PHAs and field offices to ensure deficiencies are corrected within the established timelines. We look forward to working with HUD during the audit resolution process.
Comment 3	We acknowledge HUD's commitment to clarify its expectations and PHA self-inspection requirements as part of its NSPIRE Standards and final rule. HUD also indicated that the administrative notice it intends to issue after the NSPIRE Standards and final rule are effective, will include procedures for how and when PHAs would provide those self-inspections to HUD. We look forward to working with HUD during the audit resolution process.
Comment 4	We appreciate the willingness of both HUD REAC and OFO to develop a training program for the field offices to improve HUD's oversight of the physical conditions of public housing developments. We look forward to working with HUD during the audit resolution process.

Appendix B – Federal Regulations and Other Requirements

HUD's regulations at 24 CFR 5.701(c) state that subpart G – Physical condition standards and inspection requirements applies to public housing (housing receiving assistance under the U.S. Housing Act of 1937, other than under Section 8 of the Act).

HUD's regulations at 24 CFR 5.703 state that HUD housing must be decent, safe, sanitary, and in good repair. Owners of housing described in 24 CFR 5.701(c), PHAs, and other entities approved by HUD owning housing must maintain such housing in a manner that meets the physical condition standards set forth in this section to be considered decent, safe, sanitary, and in good repair. These standards address the major areas of HUD housing: the site, the building exterior, the building systems, the dwelling units, the common areas, and health and safety considerations.

HUD's regulations at 24 CFR 902.22(f)(1), life-threatening deficiencies, state that to ensure prompt correction of life-threatening deficiencies, before leaving the site, the inspector gives the development representative a Notification of Exigent and Fire Safety Hazards Observed form that calls for immediate attention or remedy. The development representative acknowledges receipt of the deficiency report by signature. The development or PHA must correct, remedy, or act to abate all life-threatening deficiencies cited in the deficiency report within 24 hours of the development representative's receipt of the notification form. In addition, the development or PHA must certify to HUD within 3 business days of the development representative's receipt of the notification form that all life-threatening deficiencies have been corrected, remedied, or acted upon to abate within 24 hours.

HUD's Record and Process Inspection Data (RAPID) User Manual, Version 4.0, page 26, states that after the PHA certifies the correction of life-threatening deficiencies, the field office reviews and renders a final decision of "accepted" or "incomplete."

Timeline of HUD's PHA Self-Inspection Requirements

Federal Register Notice, 63 FR 35672, dated June 30, 1998, proposed changes to HUD's previous Public Housing Management Assessment Program. Section III.A.1. of 63 FR 35672, dated June 30, 1998, page 35676, states that public housing is not only currently subject to a standard of decent, safe, and sanitary; there is also an obligation of the PHA to "inspect" public housing units. Section 6(j)(1)(G) of the 1937 Act, as amended, ("Act") requires the PHA to inspect units to determine "maintenance or modernization needs." Indicator 5, Annual Inspection of Units and Systems, provides that "All occupied units are required to be inspected." This rule would not change the current requirement for an annual inspection. The Act, as amended states that the HUD Secretary must develop indicators to assess the management performance of PHAs and that the indicators must enable the Secretary to evaluate the performance of PHAs and, in part, use the percentage of units that an agency fails to inspect to determine maintenance or modernization needs as part of the assessment. Section III.A.3 of 63 FR 35672, dated June 30, 1998, page 35677, states that PHAs preserves the statutory indicators found in section 6(j) of the Act.

Federal Register Notice 63 FR 46566, section III.D, page 46572, dated September 1, 1998, states, "Public housing agencies are basically governmental entities that are government-funded under the US Housing Act of 1937 (1937 Act), for the purpose of providing public housing to low-income households. Public housing agencies are subject to a statutory requirement to inspect 100 percent of their units to

determine maintenance and modernization needs.” The notice goes on to state that HUD will conduct independent inspections using the UPCS protocol.

Federal Register Notice 63 FR 46596, section III.A, page 46599, dated September 1, 1998, states that under PHAS, Indicator 3, Management Operations, is worth approximately 30 points. The inspections of public housing units and systems are worth approximately two points each, for an approximate total of four points, or 13 percent of the total points available for the management and operations indicator. Section III.C of the notice, page 46601, goes on to state that, “While Indicators #1 and #3 both require physical inspections, they do not serve the same purpose. The HUD inspection under Indicator #1 is to determine the basic physical condition of the PHA’s portfolio. This will be determined by inspecting a statistically valid sample of the units in the PHA’s stock. The PHA will be notified of the deficiencies found in this limited assessment. Alternatively, the PHA inspection under Indicator #3 is a measure of PHA management performance. The inspection is intended to be more comprehensive and will assess each unit to determine the immediate maintenance and modernization and correct identified deficiencies. There is no intent in this rule for HUD to replace the PHA’s inherent responsibility as the property owner to maintain decent, safe and sanitary housing, through the inspection of each of its units and the timely correction of deficiencies found.”

Public Law 105-276, Title V, Section 530, of the Quality Housing and Work Responsibility Act of 1998, dated October 21, 1998, states that each PHA must conduct annual inspections for each development to determine whether the units comply with HUD’s standards. According to 66 FR 18287, section III, page 18290, dated April 6, 2001, HUD implemented this rule through annual contributions contracts (ACC) amendments. HUD form HUD-53012, ACC, does not specify self-inspection frequency; however, section 3 of the form states that except as otherwise provided by law, the PHA must comply with HUD requirements, including the 1937 Act; regulations at 2 CFR and 24 CFR; other Federal statutes; appropriations acts; executive orders; regulatory requirements; and HUD-issued notices, forms, and agreements.

In December 1998, PIH’s former Senior Director of Policy, Program, and Legislative Initiatives summarized Section 530 of the 1998 Act, stating that “public housing must be maintained in a condition that complies with standards which meet or exceed federally established housing quality standards. These standards must include requirements relating to habitability, including maintenance, health, and sanitation factors, condition and construction of dwellings, and to the greatest extent practicable be consistent with Section 8 standards. PHAs must annually inspect their public housing units.”²⁵

Federal Register Notice 65 FR 1712, section IV, page 1719, dated January 11, 2000, states that in developing the PHAS rule, HUD considered the extent to which it needed to inspect all units or some lesser number. HUD concluded that it should not inspect all units because that would be costly and PHAs are already required to inspect 100 percent of their units and systems under PHAS Indicator 3, Management Operations. HUD decided to use a statistically valid random sample methodology. This methodology is accepted throughout the scientific and business communities for making assessments regarding large universes. Additionally, 65 FR 1712, pages 1745-1746, revised 24 CFR 902.43(a)(3) to state that the management operations subindicators will be used to assess a PHA’s management operations. Specifically, management subindicator 3 examines the percentage of units and systems that

²⁵ https://www.hud.gov/sites/documents/DOC_8927.PDF

a PHA inspects annually to determine short-term maintenance needs and long-term Public Housing Capital Fund needs. This management subindicator requires a PHA's inspection to use HUD's UPCS and requires all occupied units to be inspected.

Federal Register Notice 66 FR 59080, section 3, pages 59080-59081, dated November 26, 2001, states that under PHAS, HUD evaluates a PHA based on the following four indicators: (1) the physical condition of the PHA's public housing properties, (2) the PHA's financial condition, (3) the PHA's management operations, and (4) the residents' assessment (through a resident survey) of the PHA's performance. Of the total 100 points available for a PHAS score, a PHA may receive up to 30 points each for physical, financial, and management operations, with the resident assessment accounting for the remaining 10 possible points.

Federal Register Notice 73 FR 49544, section III, page 49551, dated August 21, 2008, proposed to remove the requirement for PHAs to submit a management operation certification, which included the certification that they completed inspections of 100 percent of their units annually, under Indicator 3, Management Operations.

Federal Register Notice 76 FR 10136, section III, page 10139, dated February 23, 2011, states that under the interim rule, HUD has removed the management and operations certifications as a scored element. Therefore, PHAs no longer receive a score on whether they self-certify that they have inspected 100 percent of their units and systems under PHAS indicator 3.

In January 2012, HUD issued a public housing management newsletter, volume 3, issue 1, notifying PHAs that while they are obligated to inspect each development annually, they are no longer required to inspect 100 percent of their units annually and that PHAs may have the latitude to schedule unit inspections in a manner that can satisfy the statute's intent and simultaneously free up resources. The newsletter appeared to have been removed from HUD's website between September 2019 and September 2020.

Federal Register Notice 84 FR 43536, section III, page 43541, dated August 21, 2019, for NSPIRE, states that PHAs must meet the inspection standard of inspecting 100 percent of public housing units annually.

Federal Register Notice 86 FR 2582, section II, page 2587, dated January 13, 2021, request for public comment for the proposed rule for the implementation of NSPIRE, states that 42 U.S.C. (United States Code) 1437(d)(f)(3) requires that each PHA inspect all public housing developments annually. The proposed rule would add a new regulation at 24 CFR 5.707, which would explicitly require annual self-inspections of all units in a development.

HUD's regulations at 24 CFR 5.705 state that any entity responsible for conducting a physical inspection of HUD housing, to determine compliance with this subpart, must inspect such HUD housing annually in accordance with HUD-prescribed physical inspection procedures. The inspection must be conducted annually unless the program regulations governing the housing provide otherwise or unless HUD has provided otherwise by notice.

Appendix C – Sampling Results

Inspection Characteristics

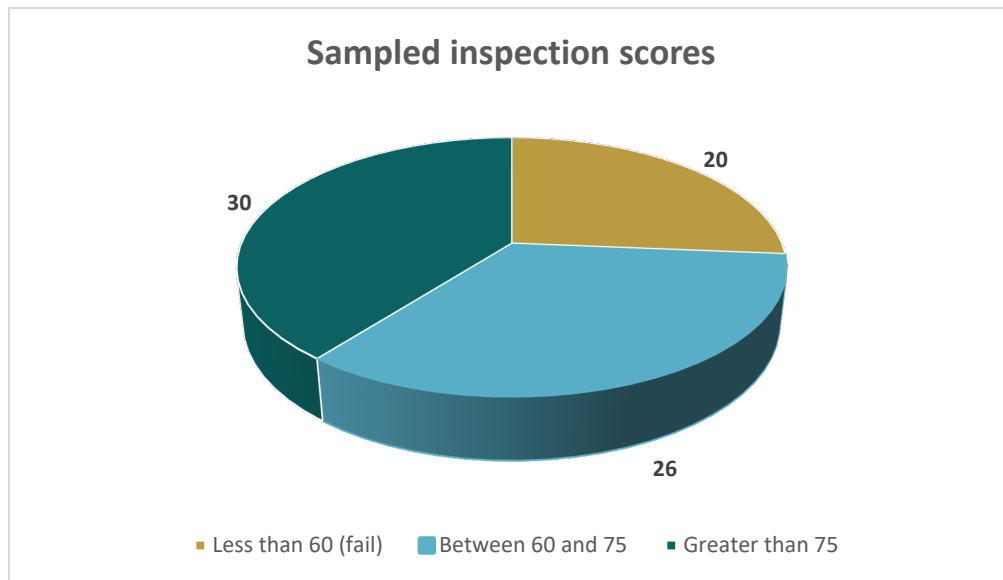


Chart 1

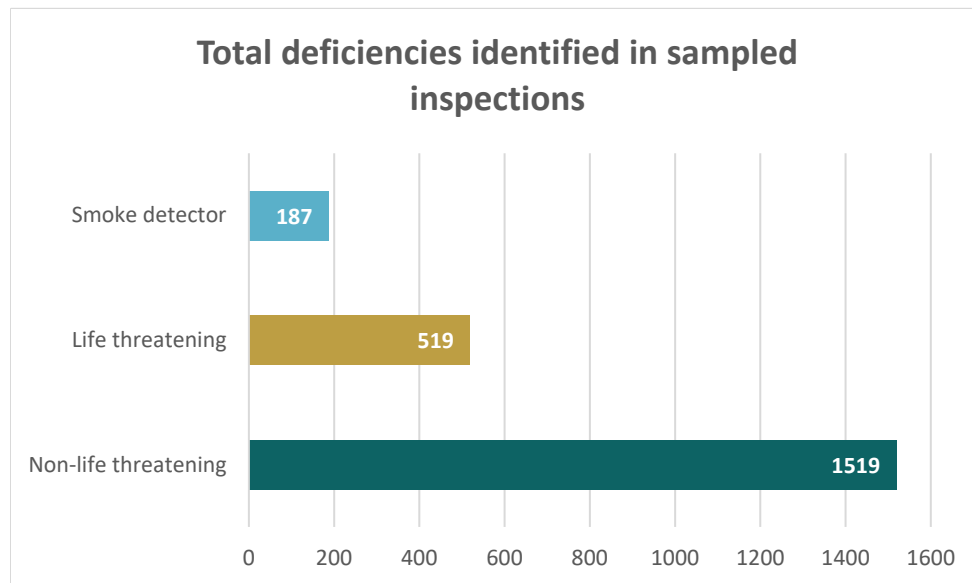


Chart 2

Reviews, Responses, and Documentation

Topic: PHA use of PASS for life-threatening deficiency correction certifications for the 76 inspections sampled

Did the PHA certify that life-threatening deficiencies were corrected in PASS?

Answer selection choices	Total	Percentage
Yes	64	84%
No	12	16%
Totals	76	100%

PHA certified life-threatening deficiency correction in PASS

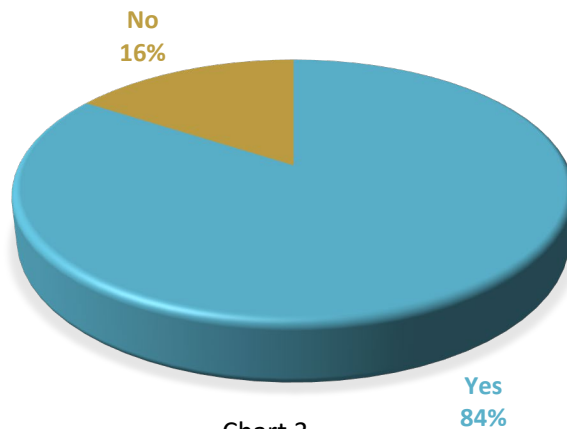
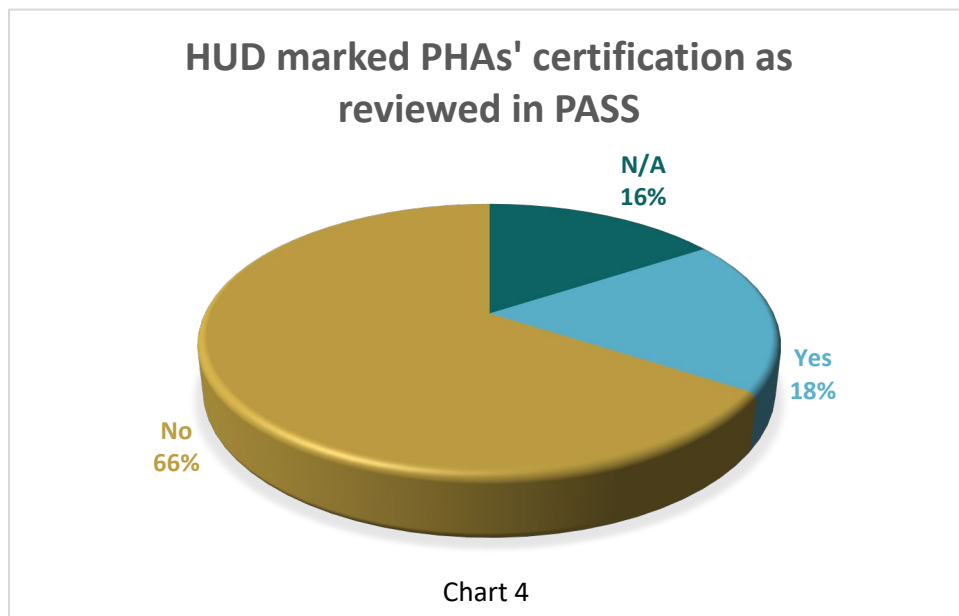


Chart 3

Topic: HUD review of PHA life-threatening deficiency mitigation certifications for the 76 inspections sampled

Did HUD mark the PHA's life-threatening certification as reviewed in PASS?

Answer selection choices	Total	Percentage
N/A ²⁶	12	16%
Yes	14	18%
No	50	66%
Totals	76	100%



²⁶ N/A is for instances in which a PHA did not enter mitigation certifications into PASS; therefore, HUD would not be able to mark the instance as reviewed. This also indicates that the field office may not have followed up with the PHA to ensure that the mitigation certifications were entered or the PHA may have issues in accessing the system.

Topic: Field office communication with PHAs about life-threatening deficiencies

Did the field office communicate with the PHA about the correction of life-threatening deficiencies?

Answer selection choices	Total	Percentage
Yes, support provided	26	34%
Yes, no support provided	8	11%
No	28	37%
No response	14	18%
Totals	76	100%

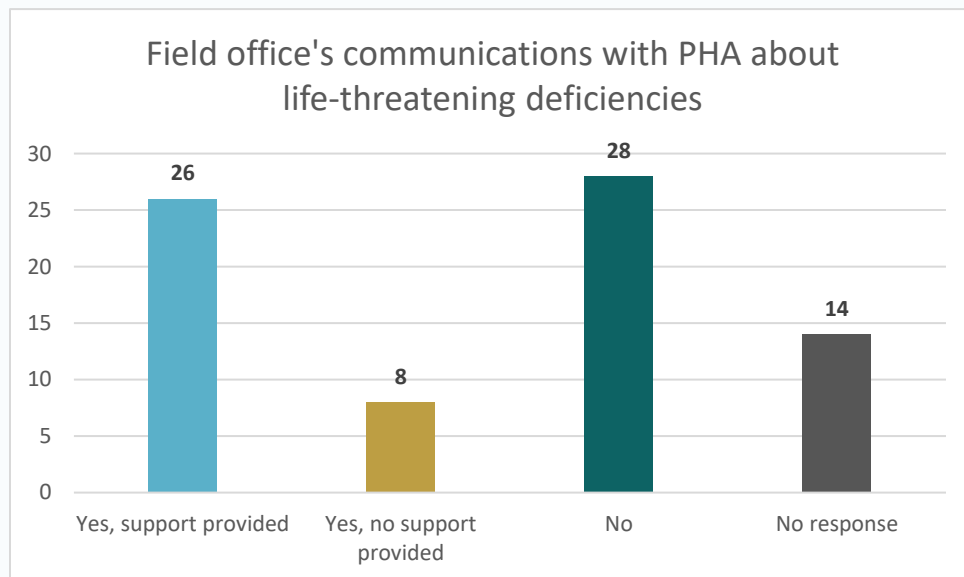


Chart 5

Topic: Field office verification of PHA correction of life-threatening deficiencies

Did the field office verify that life-threatening deficiencies were corrected?

Answer selection choices	Total	Percentage
Yes, support provided	25	33%
Yes, no support provided	5	7%
No	32	42%
No response	14	18%
Totals	76	100%

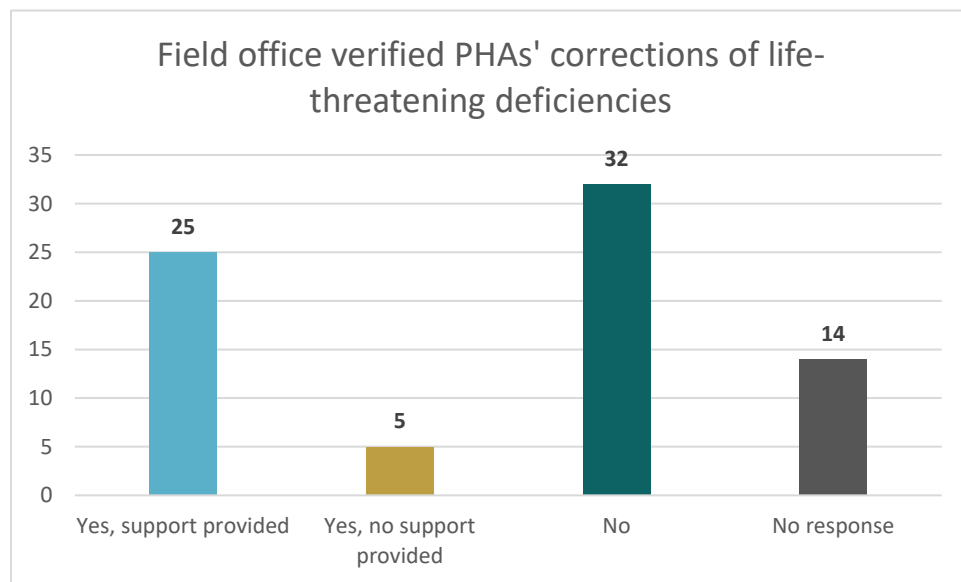


Chart 6

Topic: Field office communication with PHAs about non-life-threatening deficiencies

Did the field office communicate with the PHAs about the non-life-threatening deficiencies?

Answer selection choices	Total	Percentage
Yes, support provided	5	7%
Yes, no support provided	9	12%
No	48	63%
No response	14	18%
Totals	76	100%

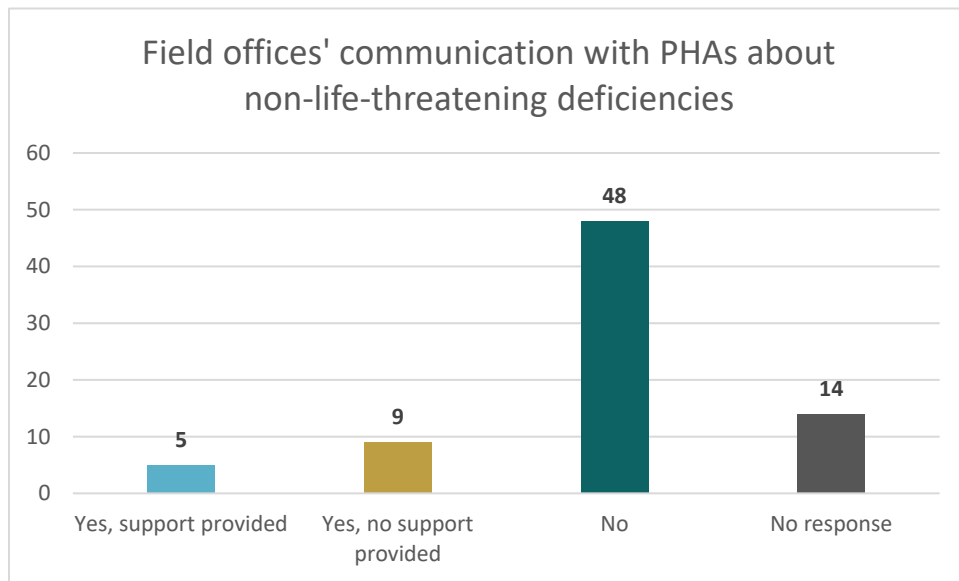


Chart 7

Topic: Field office verification of PHA mitigation of non-life-threatening deficiencies

Did the field office verify that the non-life-threatening deficiencies were corrected?

Answer selection choices	Total	Percentage
Yes, support provided	1	1%
Yes, no support provided	7	9%
No	54	72%
No response	14	18%
Totals	76	100%

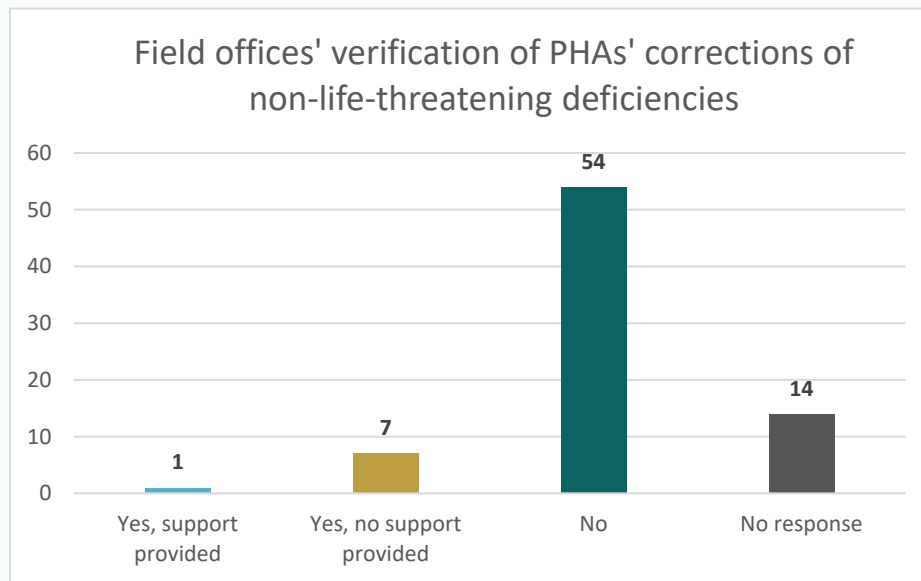


Chart 8

Topic: PHA annual self-inspections

Does the field office review and discuss the deficiencies identified by PHAs during their annual self-inspections?

Answer selection choices	Total	Percentage
Yes	16	36%
No	24	55%
No response	4	9%
Totals	44	100%

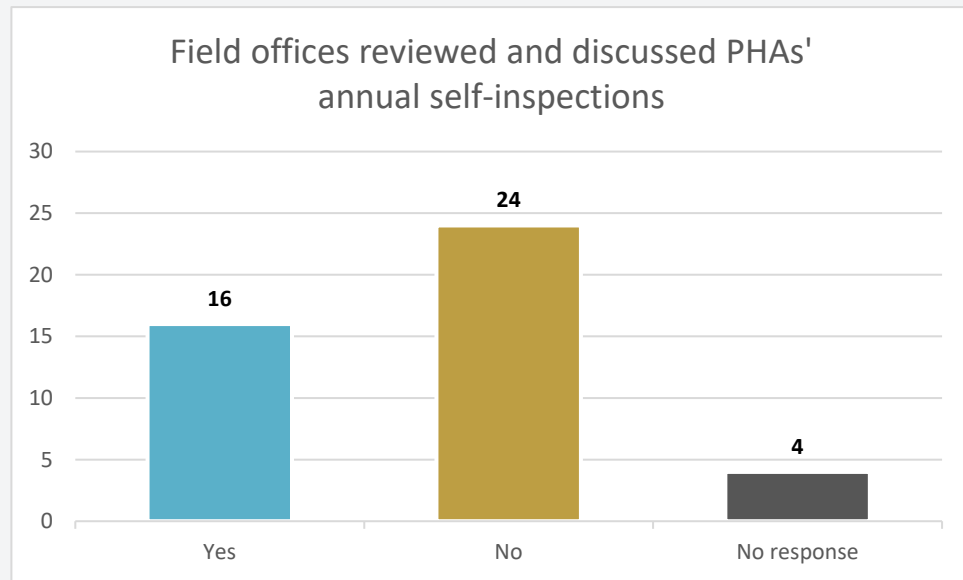


Chart 9

Topic: Additional guidance or resources

Does the field office believe that additional guidance or resources from OFO would assist it in better overseeing unit conditions in public housing?

Answer selection choices	Total	Percentage
Yes	28	64%
No	12	27%
No response	4	9%
Totals	44	100%

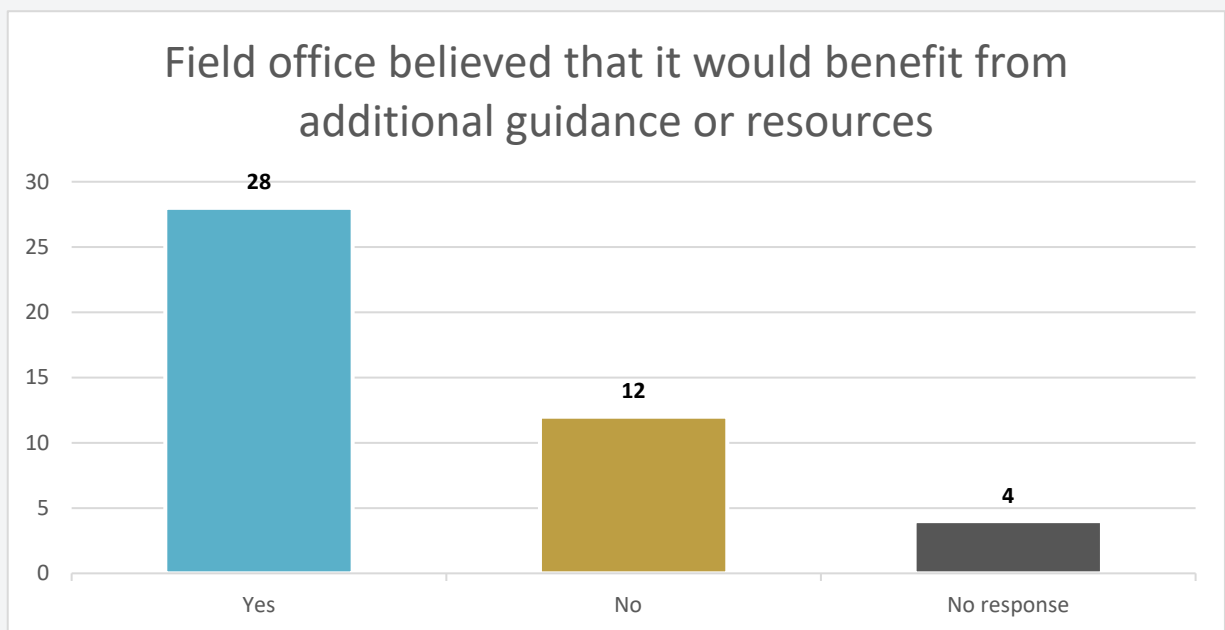


Chart 10