



OFFICE OF PUBLIC AND INDIAN HOUSING

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

Special Attention of:
Office Directors of Public Housing,
Regional Directors, and Public Housing
Agencies.

PIH Notice 2020-31

Issued: November 12, 2020

Expires: This notice remains in effect until amended, superseded, or rescinded

Cross References: PIH Notices 2019-23, 2017-20, 2020-05, 2016-05, 2017-20 and 2020-13, REV-1.

SUBJECT: Remote Video Inspections for Housing Choice Voucher Program

- I. Purpose:** This notice gives public housing agencies (PHAs) guidance on conducting Housing Quality Standards (HQS) inspections using Remote Video Inspections (RVIs). In RVIs, an HQS inspector performs an HQS inspection from a remote location using video streaming technology via a person at the inspection site who serves as a proxy. The proxy follows the direction of the HQS inspector throughout the entire inspection process, which is described below.
- II. Background:** [Section 8\(o\)\(8\)](#) of the United States Housing Act of 1937 is the statutory provision detailing inspection requirements for housing choice voucher (HCV) and project-based voucher (PBV) units. The provision contains initial inspection requirements, biennial inspection requirements, and additional provisions addressing PHA inspections. [24 CFR 982.405\(a\)](#) states: The PHA must inspect the unit leased to a family prior to the initial term of the lease, at least biennially during assisted occupancy, and at other times as needed, to determine if the unit meets the HQS. (See [24 CFR 982.305\(b\)\(2\)](#) concerning the timing of initial inspection by the PHA.) These inspections must adhere to the HQS, the performance requirements and acceptability criteria of which are detailed in [24 CFR 982.401](#). PHAs are ultimately responsible for how inspections are conducted and for determining if certain housing conditions violate HQS.

Regardless of the use of technology to facilitate the presentation of information, the PHA remains responsible for the conduct of the inspection, and any judgments made about whether a condition is a violation of the HQS must be made by the PHA. There may be some circumstances where the application of technology provides insufficient information or evidence to the PHA to allow it to make an appropriate determination.

The contents of this document, except when based on statutory or regulatory authority or law, do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies.

PHAs that incorporate technology into their processes should have policies and procedures in place on how to handle those limitations.

The RVI procedures detailed in this notice will enable PHAs to comprehensively inspect units in a manner that meets the basic statutory and regulatory standards.

III. Considerations and Best Practices for Incorporating RVI:

Inspections generally follow 4-phases: (1) administrative preparation, (2) pre-inspection planning, (3) performance of the inspection and (4) post inspection. Below are considerations and best practices for RVI:

Administrative Preparation

- Evaluate whether incorporating technology into the inspection process requires an update of the HCV Administrative Plan to provide stakeholders fair notice of the purpose and benefits of utilizing RVIs for HQS inspections. A best practice is to describe locally imposed requirements about who can participate in an RVI and additional requirements if an RVI cannot be successfully completed. For amendments related to COVID-19, PHAs are reminded of the waiver authority provided by PIH Notices 2020-5 and 2020-13, REV-1.
- Determine if the use of technology as part of the inspection process constitutes a significant amendment to the Annual Plan. PHAs revise Annual Plans in accordance with;
https://www.hud.gov/program_offices/public_indian_housing/pha. For amendments related to COVID-19, PHAs may use the current waivers described under PIH Notices 2020-5 and/or 2020-13, REV-1.

Pre-Inspection Planning

- Assess Equipment Needs. Consider whether the party performing the RVI has the equipment, and if not, how it is to be provided. HUD recommends the following:
 1. Distance measuring device, i.e., a tape measure.
 2. Lighting device, i.e., a flashlight.
 3. Circuit analyzer to test the low-voltage operation of electrical lines.
 4. Means to test smoke and carbon monoxide detectors.
 5. Temperature device for displaying the internal unit temperature.
 6. Smartphone or tablet is fully charged with a reliable internet connection. Wi-Fi has the best streaming reliability and quality, but 4G or better cellular data service supports video streaming. The device needs a high camera resolution (megapixels, sensors, and pixel size) to see details such as paint chips or broken glass.
 7. Any additional items the PHA deems necessary.
- **Scheduling RVI.** Use standard HQS procedures for scheduling the inspection. HUD recommends the tenant, or the landlord or property manager attend the RVI inspection. Additionally, the RVI tenant notifications should explain RVI, the

rationale for RVI implementation, and provide a contact number and email address for tenants to raise questions or concerns.

- Ensure the inspector and designated proxy successfully completes the free online [Lead based Paint Visual Assessment Training Course](#), for properties built before 1978 where a child under 6 resides or will reside (Reference www.hud.gov/program_offices/healthy_homes/enforcement/regulations and [24 CFR 35.1215](#) (a)(1)). Persons trained are to email the certificate of completion to the inspector. The inspector adds the certificate of completion to the inspection file.

Performing the Inspection

- Provide adequate privacy safeguards for the protection of Personally Identifiable Information (PII). The PHA's HQS inspector can be in the PHA office or other remote location, using equipment that provides PII safeguards.
- Choose a proxy for the inspection. The proxy can be the landlord, property representative, tenant, or any adult associated with this tenancy. The selection of the proxy is a mutual decision between the PHA, landlord, and tenant (see proxy certification in Section IV).
- Once the inspection is scheduled, the HQS inspector uses the PHA's designated streaming web-based platform to contact the proxy. The HQS inspector uses the same inspection form the PHA currently uses to record any deficiencies. If the PHA currently uses handheld devices rather than a paper form, decide on a consistent conversion process.

Post-inspection

- Inspection passes. PHAs follow its Administrative Plan/procedure, informs the tenant/landlord, and follow the process to (1) process HAP for initial inspection or (2) approves inspection within their system.
- Inspection fails. PHAs follow its Administrative Plan/procedure, informs tenant /landlord of fail items, including any follow-ups such as a reinspection/verification or requirement for Lead-Based Paint (LBP) clearance testing.

IV. Considerations and Best Practices RVI Inspection Process: The purpose of this section to provide a sample best practice process for PHAs considering to RVIs. The only requirement in this section is the Lead Based Paint process in item number 4. It is up to the PHA to develop its RVI inspection process. RVI procedures should ensure consistency among inspectors and the proxy inspector. Document items that fail inspection with a file photo. The general sequence of the inspection is as follows:

1. Prior to the inspection commencement, verify the unit on screen is the unit scheduled to be inspected. From outside the unit, confirm the address and street name.
2. Once the unit is confirmed, inspect the exterior of the unit (outside walls, roof, any exterior item inspectable including the yard) and adjoining properties.
3. Inspect all interior spaces, bedrooms, common areas, and tenant-accessed areas.
4. For a pre-1978 property, follow National and State LBP requirements for an HQS inspection.

- a. Verify that the proxy completed the [Lead based Paint Visual Assessment Training Course](#).
 - b. Exterior: Examine all sides of the structure, including but not limited to fences and outbuildings. Visually examine paint conditions of all siding, trim, windows, porches, steps, columns, and any other painted areas.
 - c. Interior: Review each room separately and visually examine paint conditions of walls, ceilings, steps, floors, doors, door frames, and windows, including window troughs.
 - d. For deteriorated paint (including cracked, chipped or otherwise damaged paint), document the amount of deterioration, indicating whether the scale is greater or less than the HUD de minimis amounts ([24 CFR 35.1350\(d\)](#)).
5. Complete the process of generating notification letters to the landlord and/or tenant to communicate inspection results.
 6. Schedule re-inspection/clearance test, if needed, in accordance with the PHA/LBP policy.

Proxy Certification. Prior to the RVI, the PHA and impacted parties with legal possession of the unit should agree to use an RVI rather than an on-site inspection by PHA staff. This agreement is usually with the owner/landlord for an initial inspection of unoccupied units as the potential tenant may not have legal access yet. In the case of an occupied unit, the agreement is usually with the tenant or other adult household member. If an agreement cannot be reached, the PHA follows the procedures for on-site inspections.

Notify the approved proxy in advance that participation in the RVI will involve:

1. Determination of no smell of natural gas, Methane, or other noxious gas.
2. Completion of the free online [Lead based Paint Visual Assessment Training Course](#), for properties built before 1978 where a child under 6 resides or will reside (reference www.hud.gov/program_offices/healthy_homes/enforcement/regulations).
3. Streaming the RVI (not recorded) considering a legal review may be needed to address possible PII concerns.
4. Fully following directions of the inspector.
5. Any additional items deemed necessary by the PHA.

V. Post-RVI Inspection: PHAs are encouraged to perform additional Quality Control (QC) inspections under the RVI process. RVI QC inspections are in addition to the five percent required under SEMAP indicator #5 unless SEMAP indicator #5 is waived by PIH 2020-05 and/or 2020-13, REV-1.

VI. Notification: Submit a notification of intent to use RVI to RVI@hud.gov and use this same address for any questions or need for further information.

/s/
R. Hunter Kurtz, Assistant Secretary
for Public and Indian Housing