

**U.S. Department of Housing and Urban Development**

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OFFICE OF PUBLIC AND INDIAN HOUSING  
REAL ESTATE ASSESSMENT CENTER

Inspector Notice No. 2018-01

**TO:** All HUD Inspectors Certified in the use of the Uniform Physical Condition Standards (UPCS) Inspection Protocol

**FROM:** James E. Cunningham  
Inspector Administration (IA)

**SUBJECT:** Roof Inaccessibility 4.0 Software Documentation Requirements  
(Inspector Notice No. 2018-01)

**DATE ISSUED:** July 23, 2018

**EFFECTIVE DATE:** August 20, 2018

This notice establishes guidance for all UPCS inspectors who conduct physical inspections of HUD assisted and insured properties for entering a required comment detailing the lack of roof accessibility, when encountered. It applies to buildings with flat roofs in which the inspector is unable to inspect the roof due to no roof access.

### **Background**

Because there is no roof accessibility for some property buildings it is not possible to inspect the roof. When there is no roof access HUD has no inspection information on the condition of the roof. This problem was raised in a recent Office of Inspector General (OIG) audit and resulted in an OIG recommendation that REAC inspectors must indicate in the inspection software all instances in which they are not able to access/inspect a building's roof during a physical inspection. The roof inaccessibility comment in the inspection report will alert HUD program offices of a need to follow-up with the property to ensure that the property makes arrangements to have a subsequent roof inspection that captures the actual condition of the roof.

### **Procedures**

This requirement is only applicable to a building(s) with a flat roof. As detailed in the Compilation Bulletin, Version 3, October 2, 2017. It states:

**“I. ROOFS [:] 1. All flat roofs** that have a permanent means of access must be inspected. A stairway leading to a roof, a ladder permanently affixed to a wall, or any other apparatus that

does not require the use of a portable ladder is considered a permanent means of access. An inspector is not required to access the roof when a permanent means of access is not available.”

During each UPCS inspection the inspector MUST enter one of the following comments and provide detailed location information for any roof or roof area that is not accessible for inspection. For a flat roof to be properly inspected, it must be accessible.

- 1) “Roof access – all flat roof areas are accessible and were inspected”
- 2) “Roof access – the flat roof is partially accessible (*Inspector must provide specific location details for all areas of the roof that are not accessible and not inspected*)”
- 3) “Roof access – the flat roof is not accessible and was not inspected”
- 4) “Roof access – the roof is pitched and does not require access”

### **Administration**

Should you have any questions about this notice, please contact the REAC TAC at 1-888-245-4860 or email [reac\\_tac@hud.gov](mailto:reac_tac@hud.gov).