

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. 2016-03

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

FROM: James E. Cunningham, Public and Indian Housing Real Estate Assessment Center (REAC) Inspector Administration (IA)

SUBJECT: Uniform Physical Condition Standard (UPCS) Deficiencies and Industry Standard Repairs

DATE ISSUED: July 11, 2016

EFFECTIVE DATE: For All Inspections Conducted on or After August 1, 2016

This notice provides clarification concerning inspection procedures to be followed by all Uniform Physical Condition Standard (UPCS) inspectors who conduct physical inspections of HUD assisted and insured properties. The inspection procedures are applicable to all properties that are subject to UPCS physical inspections.

Background

For the past several months our Quality Assurance Inspectors have noticed a growing trend of non-industry standard inferior repairs in preparation for a REAC inspection at some properties. This trend may be the result of decisions to embrace the practice of minimal inferior repairs in order to pass the REAC inspection. Such a practice eventually leads to diminished living conditions because of repairs that do not meet the “Industry Standard” for being a reasonable and/or an appropriate repair (e.g. plywood covering a hole in a drywall wall or ceiling).

Standard

All repairs to address UPCS deficiencies in preparation for a REAC inspection shall be made in a good and workmanlike manner with materials that are suitable for the purpose and free from defects. The phrase “good and workmanlike manner” means:

- a. Ensuring that the component, as repaired, performs its intended function/purpose; and
- b. Finishing the repair in a manner reasonably compatible with design and quality of the original and adjoining decorative materials.

Clarifying Guidance

Each repair is made in accordance with the industry standard for the particular inspectable item (e.g., a hole in the drywall is repaired using the same or equivalent materials, materials have the same texture, minimal deviation from and/or have an indistinguishable difference from the original esthetics/appearance.) A deficiency will be recorded for each sub-standard repair made to avoid or disguise an observed deficiency based on the size of the area affected and/or the item inspected.

For example, inspectors will examine a piece of plywood covering a hole in the drywall to determine, among other things, if it is larger than 8 ½" x 11" (a sheet of paper). This means that:

- a. A 6" x 6" piece of plywood that is not of like material to cover a hole will be recorded as a Level 1(L1) deficiency;
- b. A 2' x 2' piece of plywood will be recorded as a Level 2 (L2) deficiency; however,
- c. A piece of plywood, regardless of size, that covers up a hole that completely penetrates the wall will be recorded as a Level 3 (L3) deficiency.

The following is a partial list of typical inspectable items that are often incorrectly repaired:

- a. Cracks in Brick Wall. Tuck-pointed using mortar is the correct means of repair; caulking is not appropriate.

Clarification/Exceptions:

In addition to tuck-pointing, the use of newer (ASTM class) products designed specifically for repairing concrete cracks is also acceptable. These must be made in a professional manner and the repairs shall not be easily distinguishable. The use of interior/exterior painters caulking is not acceptable.

Example of an Acceptable product:

POLYURETHANE MORTAR JOINT SEALANT

PRODUCT No. 8620-18

PRODUCT DESCRIPTION

QUIKRETE® Mortar Joint Sealant is a textured one-component, fast-curing, flexible material providing a durable elastic bond.

PRODUCT USE

QUIKRETE® Mortar Joint Sealant is suitable for interior and exterior mortar joint applications. QUIKRETE® Mortar Joint Sealant Adhesive has excellent adhesion to concrete, masonry, stucco, pre-painted metal, glass, plywood, aluminum, steel and many plastics and composites.

SIZES

QUIKRETE® Mortar Joint Sealant is available in 10.1 oz (300 ml) tubes

YIELD

Each 10.1 oz (300 ml) tube can be applied to approximately 12 lineal feet (3.7 m) in a 3/8" (10 mm) bead

TECHNICAL DATA

QUIKRETE® Polyurethane Mortar Joint Sealant meets ASTM C 920, Type S, Grade P, Class 25, Use T, M, G, A, O: Federal Specification TT-S-00230C, Type I, Class A: CSA CAN/CGSB 19.13-M87. Meets California Air Resources Board 2008 requirements for volatile organic compound (VOC) content.

QUIKRETE® Mortar Joint Sealant, when tested in accordance with standard procedures, provides typical results as listed in Table 1.

DIVISIONS 3 & 7

Maintenance of Concrete
03 01 00
Joint Sealant
07 92 00



APPLICATION

Remove dirt, oil, moisture and/or old adhesive. Sand or grind if necessary to expose a sound surface. Cut plastic tip to desired size and puncture airtight seal at base of tip. Using a caulk gun, apply caulking to one of the surfaces to be bonded. Force sealant into gaps or cracks and smooth bead to desired shape. Be certain to fill all gaps when working on rough surfaces. QUIKRETE® Mortar Joint Sealant will bridge gaps up to 3/8" (10 mm) wide.

Two examples of what is Not Acceptable:

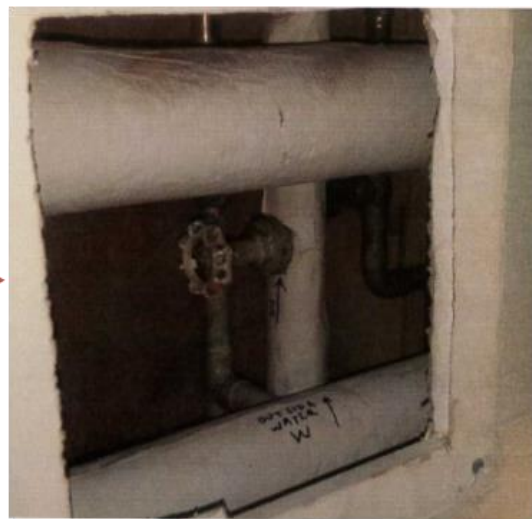
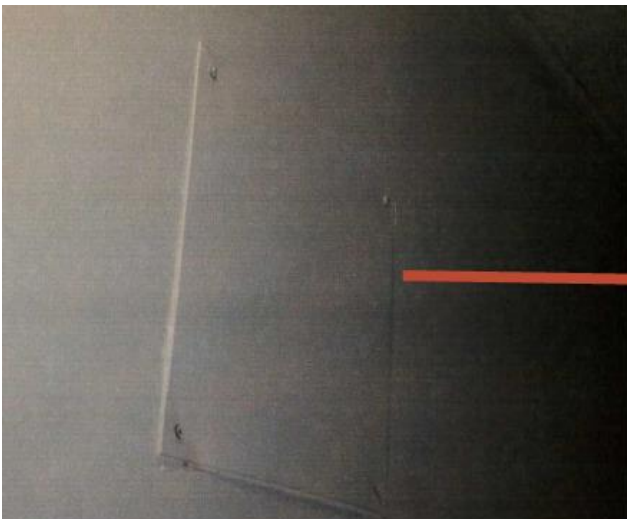


- b. Drywall Repair. Sheetrock with mud and/or tape is the correct means of repair. Simply covering a hole or damaged drywall with plywood/laminate is not correct.

Clarification/Exceptions:

The exception to this rule regarding sheetrock repair is for intentional holes in the sheetrock to allow for access to plumbing, electrical, telephone, etc. These access points shall be covered, secured, and may use alternate materials other than sheetrock to cover the access point. The inspector will require that a sampling of these access point covers be removed to verify the purpose of cover.

Acceptable:



Examples of Acceptable Drywall repairs: (obviously needs paint)



Examples of Unacceptable Drywall & Wall repairs:



- c. Wooden Door Repair. Wood or wood veneer is the correct material for repair. Sheetrock mud or plywood is not correct.
- d. Downspouts. Same materials, shape and design are correct. Plastic or PVC piping is not correct.

Clarification/Exceptions:

The use of plastic corrugated and PVC piping is acceptable if used for its intended purpose.

- The plastic corrugated piping is acceptable if used as an extension at the end of the downspout to assist with directing water away from the foundation but shall not be used as part of the gutter/downspout system attached to the building.

Examples of **Acceptable** applications for plastic corrugated piping:

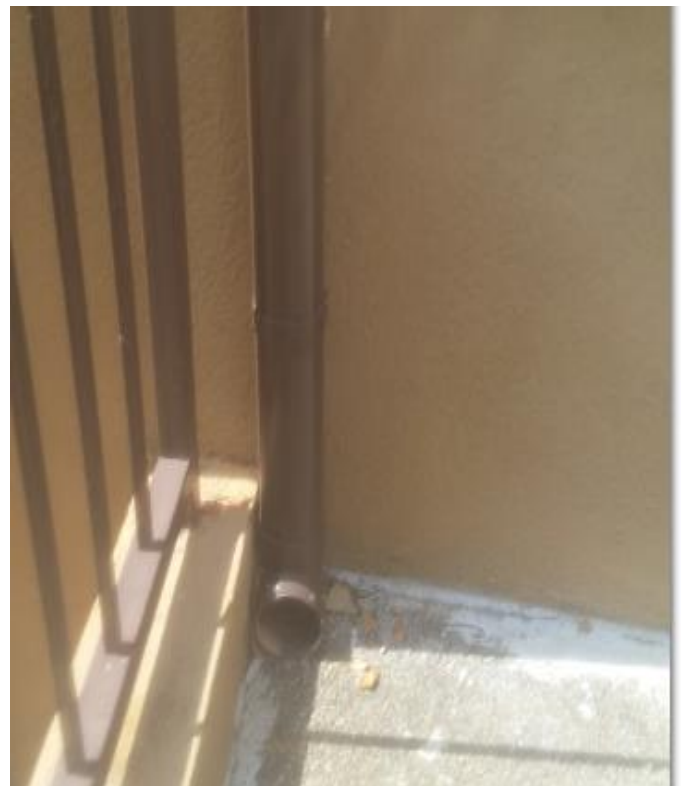
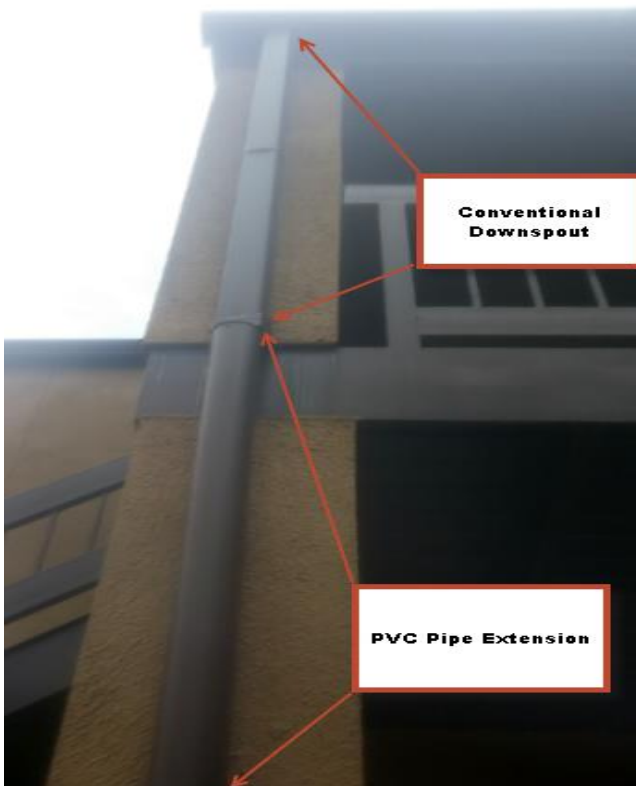
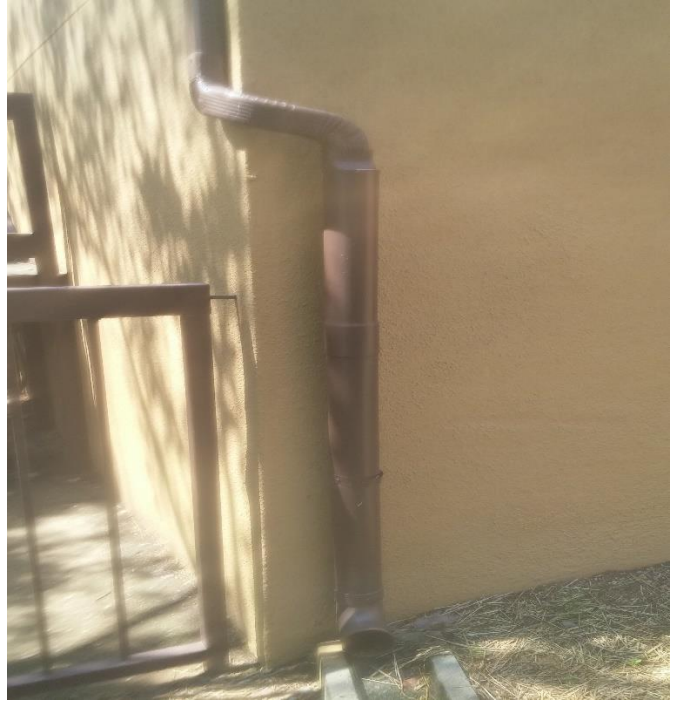


Example of **Unacceptable** Applications for Plastic Corrugated Piping:



PVC piping will be allowed provided it is properly installed (as shown in the photo below) and is painted to match the adjoining gutter/downspout system.

Examples of Acceptable Applications for PVC Piping:



Example of Unacceptable Application for PVC Piping:



- e. Erosion. Correcting the root cause of the erosion is the correct means of repair, for example, correct or repair the drainage or add fill-soil. Simply hiding or covering the erosion with mulch or straw is not correct.

Clarification: Often we find that the property hides the evidence of erosion by covering the grounds with mulch, wheat straw, pine straw, or other ground cover in lieu of correcting the cause. As the inspector if you see evidence that this is the case while inspecting a property, you will investigate further to assess if erosion is ongoing and just hidden from view or if the appropriate repairs (fill dirt, seeding, piping, etc.) have been done and the ground cover is just an integral part of the process. (Ex: Wheat straw to cover newly seeded areas)

Examples of Unacceptable Erosion Control:



- f. Electrical Panels. Installing a correct panel cover or using manufactured blanks is the correct means of repair. Using caulking or expandable spray foam to fill gaps is not correct.

Examples of Unacceptable Repairs to Electrical Devices:



- g. Refrigerator Gasket. Replacing the gasket is the correct means of repair. Using white electrical tape, fingernail polish, white-out, etc., is not correct.

Clarification/Exceptions:

A one inch split or tear in the refrigerator gasket that has been repaired is no longer a defect. However, anything other than this will be recorded as a defect.

Unacceptable:



- h. Stick to hold up a Window. Repairing or replacing the original lock is the correct means of repair. Placing a stick in the window as the primary means of securing a window or sliding door is not correct.
- i. Inspection of the gas water heater/gas HVAC vent piping. The piping shall be inspected to ensure that it has no gaps in the piping (sometimes hidden by tape) and the piping size runs from either one continuous size or runs from smaller to larger beginning with the smaller piping at the water heater

Acceptable:



Examples of Unacceptable and Incorrect Gas HVAC/Water Heater Venting:





Administration

Inspectors will record a deficiency for inspectable items in which non-industry standard repairs are observed that are intended to disguise a UPCS deficiency.

Property representatives may use the Technical Review/Database Adjustment process to appeal deficiencies cited in which non-industry standard repairs were made if the property's management believes a deficiency should not have been recorded.

The appeal process is the same as appealing any other item and requires the property representative to present appropriate documents that support the repair meets industry standards. Such appeal documents/information must contain both the supporting industry standard documents, as well as a written justification by a third-party subject matter expert for the particular deficiency type being appealed.

Should you have any questions about this notice, please contact the REAC TAC at 1-888-245-4860 or at reac_tac@hud.gov