



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

Special Attention of:
Executive Directors, Agency
Personnel and Independent Entities
That Conduct Housing Quality Standards
(HQS) inspections

Notice PIH 2013-17

Issued: July 2, 2013

Expires: Effective until amended,
Superseded, or Rescinded

Cross References: PIH 2011-29

Subject: Housing Choice Voucher (HCV) Program – Review of Existing HQS Requirements and the Use of Photos to Improve HQS oversight

1. **Purpose:** This purpose of this Notice is to emphasize the need for PHAs to ensure they are meeting all of their program obligations as they relate to HQS inspections and enforcement. In addition, it also offers new guidance on the use of photos during the inspection process. Photographs can be an effective tool for improving HQS oversight, including documenting specific HQS deficiencies and verifying HQS corrections.
2. **Applicability:** This notice applies to the Housing Choice Voucher (HCV) Program, including Project-Based Vouchers.
3. **HQS Inspections and Enforcement:** The Department recognizes that in the current budgetary climate, PHAs are facing a significant reduction in their administrative fees, which may, in turn, have a significant impact on staffing resources. However, even under these circumstances, it is imperative that PHAs continue to ensure that all HCV participants live in units that are HQS compliant. Vital to this effort is ensuring that all units are inspected as required, that all HQS deficiencies are properly identified, and that all deficiencies are corrected by owners and/or tenants in a timely manner and are appropriately verified by the PHA.

The use of photos in HQS inspections can be an effective tool for improving monitoring and oversight of a PHA's current HCV inventory. In particular, photos can be used in concert with the form HUD 52580 or 52580A (inspection form) to document the overall quality of the HCV unit. PHAs may also choose to use photos only to document specific HQS deficiencies identified on the inspection form, including damages or unusual circumstances. Photos are also a good tool to verify that deficiencies have been corrected properly. HCV owners can submit photos of the corrected HQS deficiencies to PHAs, thus eliminating the need for PHAs to conduct re-inspections of units. Although verification that HQS deficiencies have been properly corrected often involves a re-inspection of a unit,

a re-inspection is not necessary if the PHA can obtain sufficient verification through other means. Please note that in the case of an inspection for initial occupancy of a unit, the PHA is required to conduct a re-inspection if the unit does not pass HQS pursuant to the initial inspection. Additionally, in the case of project-based vouchers, the PHA is required to conduct re-inspections to determine if any and all HQS deficiencies have been corrected pursuant to 24 CFR 983.103(e)(2). See Notice PIH 2011-29, Section 5.D., for more information regarding the standards for verifying that HQS deficiencies have been corrected.

The Department recognizes that many PHAs may already be using photos as part of their HQS inspections, either electronically or through hard copy files. However, all PHAs, when including photos in their HQS inspections, should follow a few simple, necessary steps. Whether PHAs are storing inspection files electronically, or with hard copy files, each photo taken should (1) be clearly labeled so that the relevant content of the photo is easily identified; (2) be matched to a specific item on the inspection form along with any written description of the HQS violation; and (3) when HCV landlords submit photos they should also be clearly labeled and matched to a specific item on the form. Although PHAs cannot require HCV owners to submit photos of corrected HQS violations, it can be an effective and efficient way for corrections to be verified. PHAs, who choose to document an HQS inspection beyond specific HQS deficiencies, may wish to include date and time stamps on their photos. This can be useful in demonstrating that an inspection started and ended on a certain date and time. The best way to do this is to date/ time-stamp the first and last photos, which can depict entry and exit of the unit.

It is incumbent upon all PHAs using photos for HQS inspections to remember that protection of tenant and landlord privacy is a serious matter. In addition to an HQS deficiency or correction, some photos may contain personal effects of the participant and/or landlord. PHAs should ensure that these photos remain secure and are used only by staff or others needing access for purposes of the HQS inspection. It is recommended that photos remain within a secure file as long as a family is receiving assistance in the specific unit. By following the steps above and creating a secure storage system for all HQS photos, PHAs can guard against the release or use of photos for unintended purposes and protect landlord and participant privacy.

- Paperwork Reduction Act:** The information collection requirements contained in this document are approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520). The OMB control number is 2577-0169. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

5. **Further Information:** Any questions pertaining to the Notice may be submitted to Christopher Bailey, Housing Program Specialist, by e-mail at christopher.r.bailey@hud.gov, or by phone at (202) 402-5554.

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Sandra B. Henriquez, Assistant Secretary for
Public and Indian Housing