

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

OFFICE OF PUBLIC AND INDIAN HOUSING
REAL ESTATE ASSESSMENT CENTER

December 8, 2021

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Mr. Tyler Glotfelty
OMB Desk Officer
Office of Management and Budget
New Executive Office Building
Washington, DC 20503

Dear Mr. Glotfelty:

The Department is seeking an Emergency Paperwork Reduction Act (PRA) review and approval in 14-days under 5 C.F.R. § 1320.13. to apply the Remote Video Inspections (RVI) protocol for the Uniform Physical Condition Standards (UPCS), the National Standards for the Physical Inspection of Real Estate (NSPIRE) inspections, and other habitability inspections to perform additional RVIs which will allow the Department to collect information, assess feasibility, and make required changes to the RVI protocols, process, and technology that will enable the implementation of RVIs for the performance of physical inspections remotely. Nine RVIs have being successfully performed and this Emergency PRA seeks to expand the RVIs to a total of 40 or more remote inspections necessary to test and evaluate RVI protocols

In the COVID-19 era many Public Housing Agencies (PHAs) and Property Owner Agents (POA) as well as families have been reluctant to conduct or allow the inspectors to conduct physical inspections as additional COVID variants still pose threats. This means that residents may be living in undesirable or unhealthy conditions. To address these potential concerns with minimum risk or exposure or disruption to residents, the Department would like to employ RVI. The RVI protocol is a tool that efficiently allows HUD to provide inspections to those properties that are unable to receive in-person inspections due to COVID. The RVI protocol is a tool that allows HUD to provide oversight to those properties that are unable to receive in-person inspections, including habitability inspections due to national emergencies such as the COVID-19 pandemic.

A RVI is a flexible way to conduct physical property inspections and is a form of visual inspection which uses a computer or smart device to allow an inspector or team of inspectors to assess the health and safety of a property from a distance. It is anticipated RVIs will help protect residents and owners by reducing the number of individuals entering the unit as it allows inspectors to remotely conduct a HUD Real Estate Assessment Center (REAC) inspection. RVIs may help PHAs and POAs prioritize maintenance and only send essential workers to the units when necessary. In addition, RVIs may be used when items at a property are inaccessible or are in dangerous environments or circumstances that prevent an on-site inspection. HUD may routinely conduct RVIs in the future. REAC has conducted nine RVIs using new RVI protocols. The Notice of Paperwork Submission (copy enclosed) explains the burden of the collection requirements. RVIs will allow REAC to increase production to see more units as

the current pandemic continues. Please note that HUD has already received notification from some PHAs and POAs they will not allow in-person inspections.

If HUD does not act immediately to implement RVI for high-risk properties, potential harms to residents may include:

- Prolonged exposure to potentially life-threatening hazards;
- Increased prevalence or incidence of potentially unsafe or unsuitable living conditions; and
- Reduced capability to identify, generate, and resolve emergency maintenance workorders.

HUD needs approval to collect information on three items:

(1) Information Checklist

This checklist will include information on public housing authorities (PHA) and property owners and agents (POA) willingness and readiness to participate in an RVI using HUD's questions.

(2) Survey of HUD assisted Residents

This survey will assess residents' willingness and readiness to participate in an RVI, using HUD's questions.

(3) Survey of Proxy (Operators)

This survey will request input from proxies on the effectiveness and utility of RVIs, using HUD's questions.

Additionally, with ongoing concerns regarding COVID-19 transmission and potential future spikes in local rates and newer variants, HUD is concerned that tenants may be uncomfortable with inspections of their units. Accordingly, there will be instances where residents, inspectors and property personnel may not feel safe with an in-person inspection. RVI is one solution to that risk. Moreover, existence of life-threatening defects inside units may not be detected without an inspection, which could lead to harming residents. Thus, the Department aims to minimize risk to the residents' health and safety when other unit inspection options may be unavailable by initiating remote video inspections as an alternative and additional venue.

HUD Public Housing Agencies (PHAs), and Multifamily Housing Property Owners and Agents (POAS) will expeditiously apply the findings observed during an RVI to prioritize resident health and safety during the national security events such as the COVID-19 pandemic or when circumstances prevent an on-site inspection. While HUD is confident this information is critical and time sensitive, please note a similar Information Collection Request (ICR) will be submitted after this 180-day emergency PRA period expires. Your immediate attention to this matter is greatly appreciated. Please reach out to Kevin Laviano, RVI, Program Manager, kevin.laviano@hud.gov, 216-357-7750, with questions. Thank you for your consideration and assistance.

Sincerely,

For

Ashley L. Sheriff
Acting Deputy Assistant Secretary, REAC

Internal HUD Distribution:						
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Name	Kevin Laviano	Ash Sheriff				
Date						

Official Record Copy U.S. Department of Housing and Urban Development form HUD-713.1 (02/03)

Previous edition is obsolete.