INSPECTIONS

INTRODUCTION

Inspections play a large and important role in the Housing Choice Voucher (HCV) Program for public housing agencies (PHAs), landlords, and tenants. Inspections are required by law and periodic inspections take place throughout tenancy, in addition to the initial inspection. Issues with the inspection process may reduce the safety of the residence and have financial repercussions for landlords. Inspection timing and results can determine how quickly a resident can move in and determine whether a landlord will receive a Housing Assistance Payment (HAP), or cause a delay or stoppage of HAP. Landlords may have to make repairs or keep a unit vacant to resolve deficiencies. With so much riding on inspections, it's easy to see why they can be a source of confusion and tension between landlords and PHAs.

The following strategies are included in this section:

Strategies to ensure consistent inspections:

- Inspections Guidance for Landlords
- Consistent Inspections

Strategies to facilitate efficiency in the scheduling and completion of inspections:

- Inspections Scheduling
- Administrative Inspections Flexibilities

Related strategies:

- Technology
- Education and Outreach
- Monetary Incentives and Reimbursement Funds
- Partnerships

The strategies in this inspections chapter address the following areas:

Inspections Process Improvements

PHA Process Improvement	Inspections Guidance for Landlords	Consistent Inspections	Inspections Scheduling	Administrative Inspections Flexibilities
Increase Recruitment				
Increase Retention	X	X	X	X
Improve Responsiveness		X	X	
Improve Tenant-Landlord Relationship		X		
Improve Inspections Process	X	X	X	X
Minimize Bureaucracy	X		X	X

The contents of this document, except when based on statutory or regulatory law or as incorporated into a contract, 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 legal or contractual requirements or agency policies.

In this chapter of the Guidebook, strategies and their associated activities are grouped in two categories of PHA goals to increase landlord satisfaction by ensuring:

- Inspection requirements and execution are shown to be carried out consistently
- Scheduling and completion of inspections are efficiently facilitated

Many of the PHA activities involve an internal review of current inspection policies and procedures, followed by administrative changes. There are also several existing flexibilities PHAs can choose to implement which may require administrative changes but can dramatically reduce the administrative burden on both landlords and the PHA. The majority of the activities are low-cost to implement and can be combined with other strategies throughout the Guidebook to maximize the PHA's return on investment in time, staffing, procedure changes, and financial costs.

These strategies, as a whole, aim to help the PHAs make the inspection process more transparent and efficient for landlords. They offer PHAs additional options for some of the more cumbersome elements of the inspection process. Landlords who know what to expect will be better equipped to take appropriate and timely steps when faced with challenges in the process—including a failed inspection. Well-informed landlords may also be able to avoid these challenges by acting proactively and making repairs prior to an initial inspection.

Note: These strategies may combine well with some of the *Administrative Flexibilities to Enhance Landlord Satisfaction* available as part of the HUD HCV Landlord Strategies Guidebook.

OVERVIEW

This chapter will examine ways PHAs can improve the inspection experience for landlords, beginning with an overview of the inspection process. While many may be familiar with the process, this information is helpful to keep in mind while reviewing the strategies presented in the remainder of this chapter.

NOTICE: TERMINOLOGY

- Units inspections are conducted using Housing Quality Standards (HQS) or any subsequent HUD-established physical inspection standards.
- Units fail these inspections because they had an item, or combination of items, that did not meet the standards. These individual deficiencies can also be called "fails" by PHA staff.

Why Are Inspections Important?

The purpose of inspections mirrors the goal of PHAs to ensure decent, safe, and habitable housing. Inspections provide opportunities for PHAs to visit a unit and monitor adherence to HUD-established physical inspection standards. It's also important to note that inspections provide the same opportunities for landlords—a time when landlords can receive an outside evaluation on the condition of their property. While some landlords may view these visits as a bureaucratic inconvenience, they can be used to prevent potential maintenance issues that might not be caught until move-out.

News

In late 2019, HUD began a 2-year voluntary demonstration to better identify potential adjustments to standards, protocols, and processes of the National Standards for the Physical Inspection of Real Estate (NSPIRE) model prior to nationwide implementation. One of NSPIRE's core objectives is to align standards across programs in order to provide the same expectation of housing quality for all residents of HUD-assisted housing units. Additional information on NSPIRE and its applicability to HCV can be found here: *https://www.hud.gov/program_offices/public_indian_housing/reac/nspire*

The Different Types of Inspections: A Refresher

Initial – All units entering the HCV program must have an inspection. In many circumstances, but not all, the initial inspection must take place before the HAP contract is executed.

Periodic Inspection – PHAs are required to conduct regular additional inspections. They may conduct these annually or biennially, which needs to be clearly stated in the PHAs' policy documents for consistency and transparency. Additionally, PHAs designated by HUD as "small rural" may decide to carry out inspections on a triennial basis. See the final strategy in this chapter on incorporating administrative flexibilities for additional information.

Special/complaint – When the PHA receives a complaint regarding a unit from a tenant or a government official, the PHA must conduct an inspection to investigate the complaint. The timing of the inspection is determined by whether the complaint is for non-life threatening or life-threatening concerns. If the concerns raised are life-threatening, PHAs must call this an emergency inspection and the deficiency must be addressed within 24 hours.

See 24 CFR 982.405 and 85 FR 11381.

Marketing and Roll-out

Some changes to the inspection process – such as incorporating administrative flexibilities or standardizing deadlines in policy – will improve the inspection process, but may change an experienced HCV landlord's accustomed inspection routine. The PHA should inform all landlords of changes to the inspection process that require changes on the landlord's part. The PHA may need to provide information on how to make this change or who to contact for additional information. The PHA may wish to make major changes to its inspection process on a trial or limited basis until it has an opportunity to assess any impact these changes make on landlords, tenants, or PHA staff time or other resources.

Certainly, the PHA will want to make certain that landlords are fully informed about any guidance materials on the inspection process or standards that the PHA makes available.

Some changes to the inspection process may improve efficiency without requiring actions on the part of the landlord. These could include changes made by PHA internal staffing including inspectors. In those cases, once the PHA has determined that a change will be incorporated on a permanent basis, the PHA may wish to let the landlords know what the PHA is doing behind the scenes to improve landlord satisfaction and the efficiency of the inspection process.

Evaluation

PHAs should build in ways to evaluate changes for effectiveness. For example, PHAs that are making improvements to scheduling could review the average time it takes from a request for inspection to the inspection being conducted. Allowing for start-up, the amount of time between the request and the actual inspection should decrease over time.

STRATEGIES TO ENSURE CONSISTENT INSPECTIONS

In 2018, HUD organized listening forums for landlords to learn more about how to make the program more effective for them. One of the highlights in these meetings was the demand for fair and consistent assessments in inspections. Some landlords said that inspection deficiencies can seem punitive in nature. While some of the frustration experienced by landlords can be attributed to concerns about the cost of repairs combined with a misunderstanding or lack of knowledge of the regulations, it cannot be discounted that there are inspectors who are not conducting inspections consistently and/or not relaying information to landlords in an effective manner. The goal of these strategies is to help PHAs ensure that inspectors use consistent standards to conduct inspections, make landlords aware of these consistent standards, and communicate these practices in a way that reassures landlords.

There are two main strategies designed to target different elements of this issue:

1. **Inspection Guidance for Landlords**
2. **Consistent Inspections**

These activities can be implemented separately, but they are designed to work in tandem. By providing clarity on the inspection process to landlords and tenants as well as ensuring inspectors are trained to fairly, accurately, and consistently apply inspections regulations, PHAs can decrease negative perceptions of the inspection process. These activities require an up-front investment of time, but that investment will pay off in the long run.

STRATEGY: INSPECTION GUIDANCE FOR LANDLORDS

Providing landlords with clear written and verbal guidance to increase their understanding of the inspection process.

Who: All PHAs; Some activities are targeted to PHAs that have inspectors on staff.

Cost: $ $$ $$$ **Minimal to moderate.**

Implementation Considerations: ● **LOW** ○ MEDIUM ○ DIFFICULT

Inspection Guidance for Landlords PHA Process Improvements

PHA Process Improvement	Inspection Guidance for Landlords
Increase Recruitment	
Increase Retention	X
Improve Responsiveness	
Improve Tenant-Landlord Relationship	
Improve Inspections Process	X
Minimize Bureaucracy	X

WHAT THIS IS AND WHY IT WORKS: Providing landlords with information on inspection standards, the inspection process, and common HQS or any subsequent HUD-established physical inspection standard deficiencies creates more informed landlords who will have an increased ability to carry out their responsibilities under the inspection process. This, in turn, can reduce overall dissatisfaction with the inspection process. It can also minimize the perception that inspectors are enforcing inspections inconsistently, when they are, in fact, correct in the application of policy. If an inspector is inconsistent or strays from policy, informed landlords will also be able to articulate the issue instead of voicing a broad complaint of unfair treatment. This will enable PHAs to expedite a resolution and target further training efforts for inspectors.

Checklists, visual aids, and inspection training can offer landlords an understanding of

what the inspector is looking for and teach common-sense ways of getting ahead of the inspection process by carrying out preventative maintenance. If landlords conduct preventative and routine maintenance and fix items before the units are inspected, this should lead to an increased number of approved units within a shorter timeframe. It is also important that landlords understand the terminology of inspections, the HUD HCV inspection form, and correction requirements the same way HUD and inspectors understand these items.

There are three primary ways that PHAs can inform and educate landlords:

1. Written Guidance
2. Training and Education
3. Customer Service

Related Strategies:

- Landlord Orientation
- Landlord Website

IMPLEMENTATION

A successful inspection program is built on a clear understanding of the inspection process. Without this knowledge base, confusion about why and how the process is carried out can arise, leading to misunderstanding and a perception that inspections may be unfair. By providing information, through training or other means of communication to landlords, PHAs can lay the foundation for a more successful inspection program.

The activities outlined in this section are targeted at providing landlords with clear written and verbal guidance on inspections. For new landlords, this activity sets the stage for how they view and approach inspections by providing clear and up-front information about the process. For landlords who have been in the program, education efforts can help to correct any misinterpretations of how inspection policy has been applied in the past. Thus, it is a critical part of improving landlord perception of how inspections policy is applied and assisting landlords to both prevent and manage a failed inspection.

WRITTEN GUIDANCE

Providing landlords with written guidance is integral to clarifying the inspection process. Forms and materials should be made available to landlords throughout the process so landlords can refer to them when confusion might arise. Inspection staff can also point to these forms when confronted with a question since the forms are based on policy. Staff should use these as tools to clarify the process, rather than to shut down conversation.

There are existing documents that PHAs should consider providing to landlords including:

- **Inspections Form:** Receipt of the inspections form (HUD-52580) prior to an inspection allows landlords to make needed repairs and avoid failing an inspection. PHAs might consider creating a user-friendly checklist to assist landlords who would like to conduct their own pre-inspection.

Review Policies

PHAs should review their existing policies and procedures to ensure they are clear, up to date, and consistent. Inconsistent and unclear policies and procedures can result in improper application by inspectors and uncertainty for landlords. When updating policies and procedures, PHAs should check with inspectors to see if they can identify any areas that would benefit from additional clarification or instruction. Be sure to also update any associated information such as the PHA website and forms.

- **Inspections Flowcharts:** Both an HQS Initial Inspection Flowchart and a Biennial HQS Inspection Flowchart are available on HUD's *Landlord Resource webpage*. These flowcharts provide an overview of each type of inspection and can help a landlord understand the different ways they can reach a pass. PHAs should confirm that the flowcharts follow their processes and consider creating an amended PHA flowchart to distribute if the PHA's process differs.

Some PHAs may also take these materials and tailor them to fit their program, adding in information such as contact numbers to receive additional guidance.

More information is not always better!

PHAs should be mindful that while information is useful, too much can also be overwhelming and result in landlords not reviewing materials or not taking away the key points that the PHA is trying to communicate. While the PHA may have additional resources such as training materials from a new landlord orientation course, for example, these might be listed as supplemental resources that landlords can review should they wish to learn more.

Materials can be made available to landlords on the PHA's website, as part of any orientation materials provided to landlords, or distributed by inspectors. Existing landlords could receive materials through a portal.

TRAINING AND EDUCATION

Through training and education, in-person or virtual, PHAs may provide in-depth information on inspections that cannot be adequately conveyed through printed materials. Interactive methods also offer landlords an opportunity to ask questions and receive answers.

This section will primarily focus on two types of education efforts:

- Inspection 101: A primer for all landlords, but particularly for those new to the program, that presents an overview of the inspection process. This material is well-suited for incorporation into workshops such as "New Landlord Orientation." See the Education and Outreach chapter for additional information.
- Inspection Modules: These efforts can be used to target common questions or issues that landlords are experiencing. Modules can be inserted, as needed, into outreach efforts for landlords such as a lunch-and-learn or posted as a video on the PHA's website.

Tip: The Education and Outreach chapter of this Guidebook provides information that can help PHAs manage training events for landlords, including tips on determining the location and frequency of the events, as well as considerations such as marketing.

Tenant Education

Providing training to tenants on the inspection process and routine maintenance can minimize inspections issues in general.

PHAs could consider adapting the Inspection 101 materials for the tenant experience of inspections. PHAs might also consider offering or referring tenants to courses locally available on topics related to renter readiness, navigating the rental process, and maintaining a home.

The Education and Outreach and Partnerships chapters have additional information on tenant education.

INSPECTION 101

As noted previously, "Inspection 101" is an introduction to the inspection process, tailored to the landlord's perspective. Training and education on "Inspections 101" might include the following topics:

- Inspection Overview: PHAs should review why inspections are required and the benefit not only for tenants but also for landlords. Information should be included about the roles and responsibilities of the landlord, tenant, and PHA. This will be particularly helpful for landlords who are new to the program or those that might not have received a formal orientation.
- Process: PHAs should review the inspection process including when and how often inspections will take place, how the landlord can schedule an inspection, what will happen when the

inspector arrives, what happens if an item is deficient, and how to correct deficiencies. The PHA's own timeline for these activities should also be addressed. If the PHA allows for landlords to self-certify that deficiencies have been corrected or has adopted any alternative inspections requirements, the PHA should also review how these processes can benefit the landlord. Additionally, if the PHA uses a landlord portal or other technology in the inspections process, the PHA should discuss how to access the inspections-related information included on the portal, and how landlords can get additional assistance with portal access if needed.

- Common Deficiencies: While PHAs may want to address the inspection checklist in its entirety, PHAs should also provide information on common deficiencies they see in area inspections conducted under HUD-established physical inspection standards, such as HQS.

Tip: Photos may be particularly helpful to convey different reasons items are found deficient and what corrections might look like.

Inspection Process

PHAs may want to review additional information on two components of the inspection process where confusion can arise: roles and responsibilities for landlords and tenants and the abatement process. See *A Deeper Dive* at the end of this strategy for additional information.

INSPECTION MODULES

In addition to Inspections 101, PHAs may consider offering more in-depth training on certain aspects of inspections. These modules should be based on trends—questions frequently asked by landlords, or issues, such as common deficiencies, that the PHA is seeing. PHAs should ask landlords and PHA staff, including inspectors, for input prior to developing modules to ensure that they are reflective of current issues or trends.

Examples of module topics might include:

- Common inspection deficiencies and how to correct them.
- Preventive maintenance.
- Self-certifications: How to submit photos of corrected inspection deficiencies.

Tip: When determining what information will be presented, PHAs should remember that some landlords may come to the orientation with no knowledge of HUD, PHAs, or the HCV program. They may also be new to being a landlord. Be sure to spell out common abbreviations and offer short, clear descriptions of practices like accessing the landlord portal or having an HQS inspection.

As the content for inspection module trainings can vary greatly, the method of delivering the information may change based on the content. For example, discussion on common inspection deficiencies could be a 5-minute segment in an outreach event or it could be expanded to a 15-minute instructional video.

DELIVERY METHODS

Training and education on inspections is not limited to traditional in-person training opportunities. This information can be delivered through a variety of methods.

The chart below shows different delivery methods for both Inspections 101 and Inspection modules, but PHAs are free to think of new and creative ways to provide this information. Each PHA and its landlords are unique—training and education methods can be altered or created to meet the need!

	In-Person Training or Webinar	Video
INSPECTIONS 101	A good fit to add to a Landlord Orientation Workshop. It could also be a stand-alone workshop.	Could be designed for a video that could be posted on the PHA's website. If the audience trends towards new landlords, the PHA should provide a way for landlords to ask follow-up questions.
INSPECTION MODULES	A good enhancement to a landlord event such as a lunch and learn. Several modules could be combined for a stand-alone or "Inspections 202" workshop.	Well-suited for videos; topics such as preventative maintenance or common fails are enhanced by visual aids.

PHA HIGHLIGHT:

A PHA is creating educational videos on inspections after hearing about challenges in the process from landlords. The goal of the videos is to help make the inspection process easier by letting landlords know what to expect and how to prepare in advance. The PHA will produce the first video in-house but, if the pilot is successful, they may look into collaborating with local high schools to produce subsequent videos.

Written Guidance: It is recommended that any effort include written materials that can serve as a reference guide and supplement the education efforts. See the prior Section on Written Guidance for more information on types of guidance to offer.

VIDEO TIP!

Videos can also be especially useful when addressing common inspection deficiencies or preventative maintenance techniques because they allow for hands-on demonstration and real-life examples. A PHA could, for example, record a walk-through of a unit, noting areas of interest.*

With advances in technology, PHAs can record and edit videos using smartphones, eliminating the need for specialized equipment. There are also several platforms PHAs could use at no cost to post videos. While videos may need to be updated when policies change, they allow the PHA to provide detailed instruction with minimal ongoing cost.

Videos do not need to be long or of "professional" quality to be effective. Short video clips may be more effective and encourage more landlords to view them compared to longer videos. To help landlords use the video, focus on showing the item under inspection in good lighting and from more than one angle if possible. A flashlight can assist with lighting. Be sure to point out the reason the example would be found deficient or not.

On-line media platforms such as YouTube offer videos of varying lengths and quality about HQS inspections (additional search terms include "HCV inspections" and "Section 8 inspections"). Another source of inspiration might be videos from home inspection industry groups, keeping in mind the housing they inspect is regulated under different standards and their audience is the inspector.

NOTE: HUD does not promote any inspection videos. PHAs should evaluate the accuracy of any video prior to posting.

**PHAs should request permission to film and ensure that personal and identifying items are not recorded.*

CUSTOMER SERVICE

Any training and education strategy would be incomplete without the means for the attendee to follow-up and ask questions. While PHAs should be sure to incorporate a strong element of customer service into all aspects of the HCV program, the inspection process is an area that creates a lot of questions for landlords.

There are a variety of ways to provide efficient customer service related to inspections, including:

- Adding Q&A time into all inspection training and education opportunities whether these events are in-person or virtual.
- Providing an email or phone number that landlords can call with inspection questions. This contact information should be included as part of inspection notifications, during training events, at the end of any presentations (including recorded videos), and on the PHA's website. Inspectors should provide this contact information at the inspection too. As always, any contact email or phone number should be monitored and messages should be responded to in a timely manner.
- Ensuring inspectors are trained to not only provide consistent and correct application of inspections policy but also to represent the PHA. They should be equipped to handle challenging situations.
- Answering questions is important, but can be challenging. Staff that are tasked with answering questions about inspections should be knowledgeable in applicable policy. When confronted with a tough question, however, staff should feel comfortable in letting landlords know that they will need to seek additional clarification. Staff should then make sure to get back to the landlord!

Interactions between staff and landlords, particularly surrounding inspections, are an important part of building trust and creating positive relationships.

See the Consistent Inspections strategy in this chapter for specific information on customer service training for inspectors.

PHA HIGHLIGHT:

A dedicated landlord point of contact at a PHA in California is trained in HQS standards and inspections. The point of contact does not conduct official inspections, but does often perform a "soft inspection" at the properties of landlords who have questions about the inspection process. The point of contact may be able to identify potential issues so that landlords can prepare for inspections. This interaction both assists the landlords with their physical inspection and strengthens the PHA-landlord relationship.

A DEEPER DIVE:
ROLES AND RESPONSIBILITIES AND ABATEMENT

While designing educational materials for landlords, there are two areas where PHAs may want to take a deeper dive: roles and responsibilities and the abatement process. These two areas are commonly a source of confusion for landlords and can also play a huge part in how satisfied a landlord might be with the inspection process, the PHA, and the HCV Program as a whole. The below offers some additional information for PHAs to consider including in their outreach efforts.

Roles and Responsibilities

Some landlords experience frustration and confusion regarding who is responsible for inspections, especially annual (or biennial) inspections and certain repairs they identify as fixes to tenant-caused damages.

The landlord's responsibility in streamlining the inspection process includes:

- Taking preventative action to keep units safe, clean, and habitable.
- Responding in a timely manner to tenant requests for repairs.
- Repairing deficiencies identified in the inspection within required timeframes.
- Informing the PHA when deficiencies are completed in accordance with the PHA policy for submission of certification or scheduling a re-inspection.
- Enforce any lease requirements for tenant maintenance and payments.

The tenant's responsibilities in the inspection process includes:

- Allowing an inspector into their unit for an annual inspection.
- Rescheduling an inspection or informing the landlord if they cannot be available for an inspection.
- Notifying their landlord about a major repair, which could otherwise lead to more damage.
- Following the lease requirements for keeping units clean and maintained to avoid failed inspections due to tenant action or inaction, such as mold or rodent infestations due to poor house-keeping, overgrown yards, large holes in walls, or broken appliances.
- Paying for tenant-caused issues that go beyond regular wear and tear.
- Repairing tenant-caused deficiencies identified in the HQS or any subsequent HUD-established physical inspection standards inspection within required timeframes.

The PHA's responsibilities may include:

- Ensuring that inspections are conducted as required including conducting an inspection when alerted to a potential deficiency.
- Ensuring that the landlord and tenant are informed of an upcoming inspection.
- Educating tenants on family responsibilities including tenant-caused damages to units and consequences as a part of family briefings.
- Verifying that inspection deficiencies have been remedied.
- Enforcing the HAP contract and family obligations including through abatement and termination, respectively.

In addition, there are a variety of good practices that PHAs can employ to improve landlords' satisfaction with inspections.

1. Send out reminder notices to landlords and tenants about annual or biennial inspections 1 or 2 days ahead of the scheduled appointment. The landlord or adult tenant must allow the inspector in the unit for an inspection to take place. PHA policy determines who must be present for an inspection. Missed inspections may lead eventually to abatement or program termination.

2. Offer easily accessible information on the timelines and policies for missed inspections and re-inspections, and at what point the PHA abates HAP and terminates assistance to a unit or tenant.
3. Provide clear and concise information on the roles and responsibilities of tenants and landlords in the inspection process.
4. Provide a flow chart or timeline of expectations and consequences related to the inspection process.
5. Develop and implement specific inspection policies related to tenant-caused damages. Include these in landlord briefings and landlord-facing materials. Refer to the section on inspection inconsistencies for training inspectors on this policy.

Some PHAs may also be able to offer additional programs or services to tenants and landlords that help alleviate frustrations around tenant-landlord responsibilities for inspections. See the chapter Monetary Incentives and Reimbursements for information on mitigation or damage funds for landlords to make claims for tenant-caused damages to units where repair costs exceed security deposit funds. See the chapter Education and Outreach for information on tenant education including classes on how to be a good neighbor or tenants' rights and responsibility classes.

Unfortunately, even with easily accessible and concise language and instruction, some landlords will still contact PHAs with complaints around tenant and landlord responsibilities during inspections. Here are some suggestions on managing these complaints:

1. Validate the person's concerns without assigning blame. Example: "I am sorry to hear this happened; that sounds very frustrating."
2. Refer to the documents that help identify the next course of action. These may include the HAP contract, the lease between the tenant and landlord, or the Administrative Plan.
3. Whenever possible, give the person background information on why this policy exists so they understand the policy's intent, even if it is not realized in their current situation.

The Abatement Process

A source of frustration for landlords is lost rental income due to abatements. Under abatement, the PHA stops payment of HAP because the landlord has failed to correct HQS deficiencies within the allowed time period per 982.404(a)(3). Landlords may be caught off guard when the rent for their unit is abated, especially when the landlord perceives the issue as trivial, such as forgetting to schedule a re-inspection of a minor corrected deficiency. Thankfully, there are a variety of methods that PHAs can pursue to help landlords avoid abatement or better navigate the abatement process:

1. As a starting point, review all current PHA communications such as existing letters and emails to landlords regarding abatements for clarity and continuity of instructions.
2. Similarly, review the timing of these notices. Do the notices give landlords adequate time to take corrective action or to contact the PHA?
3. Provide reminder and/or warning communications to landlords several days before their lack of action will lead to abatement.
4. Remind landlords of the consequences of abatement: (1) The owner will not be paid back rent after the corrective action is taken; (2) Further inaction will lead to termination of the HAP contract for the unit.
5. For units that fail inspections for emergency conditions, make all reasonable attempts to make contact with the landlord so that corrective action can be taken expediently, both for the benefit of the tenant and the landlord.
6. Prioritize re-inspections for units that are in abatement to minimize the amount of lost rental income the landlord will experience.

STRATEGY: CONSISTENT INSPECTIONS

Internal changes that PHAs can make to ensure that inspections are conducted in accordance with HQS or any subsequent HUD-established physical inspection standards and in a consistent manner.

Who: All PHAs; Some activities are targeted to PHAs that have inspectors on staff.

Cost: $ $$ $$$ **Minimal to moderate.**

Implementation Considerations: ● **LOW** ○ MEDIUM ○ DIFFICULT

Consistent Inspections Process Improvements

PHA Process Improvement	Consistent Inspections
Increase Recruitment	
Increase Retention	X
Improve Responsiveness	X
Improve Tenant-Landlord Relationship	X
Improve Inspections Process	X
Minimize Bureaucracy	

WHAT THIS IS AND WHY IT WORKS: This strategy focuses on what PHAs can do internally to change landlords' perceptions that inspectors are not conducting inspections consistently.

These measures serve two purposes. First and foremost, they improve consistency in the inspection process. The implementation of these changes can help repair negative perceptions around the inspection process. Not only do these measures – such as providing additional training to inspections staff – confront the issue of inspections being conducted inconsistently, they can also aid in changing negative perceptions, regardless of whether or not the perception is accurate.

Customer Service: A Key to Success!

Even if inspectors are conducting HQS-compliant and fair inspections, improved customer service may help change the negative perceptions that some landlords may have. *Good customer service goes a long way to prevent miscommunications and misunderstandings. Customer service is the key to success!*

While changing perceptions can be a tricky objective, PHAs can take steps to address landlord concerns with inspections and inspectors leading to an overall improvement in satisfaction.

These activities are discussed below in greater detail (and within other strategies in this chapter), and they are listed here as they are part of an integrated approach:

1. Schedule and Conduct Inspections in a Timely Manner
2. Train and Share Information
3. Perform Quality Control
4. Simplify Inspections Across PHAs
5. Review Policies and Procedures

Related Strategies:

- Inspections Guidance for Landlords
- Administrative Inspections Flexibilities
- PHA Collaboration

Summary of Activities

Be Timely! Schedule and conduct inspections in a timely manner.

Train Staff. Make sure all inspectors receive consistent training opportunities and time to share common issues and brainstorm solutions.

Gather Information Firsthand. Have supervisors accompany inspections staff periodically. This is especially important for PHAs that contract out inspections.

Work Together. Consider forming a PHA working group in your region to make policies more consistent where possible.

Internal Review. Review existing policies and procedures to minimize any inconsistent implementation.

IMPLEMENTATION

This strategy has multiple activities that are designed to complement each other and address multiple processes. While largely unseen by landlords, the activities will greatly impact how landlords perceive the inspection process and the HCV program as a whole. Some of these activities involve gathering information from staff across multiple departments and others might rely on partnerships with other PHAs.

PHAs should consider reviewing their entire internal inspection process in the areas identified below to ensure the process is consistent and accurate.

Schedule and Conduct Inspections in a Timely Manner

Making sure the inspection process in its entirety runs efficiently is crucial to changing perceptions about the consistency of inspections. Timely inspections also result in more timely payments. Change begins with setting the tone as early in the process as possible which, for many, begins with scheduling.

Opportunities to increase the timeliness of an inspection will be examined in greater detail in the Inspections Scheduling strategy in this chapter. In this context, it is important to note that a delay in scheduling and conducting inspections can negatively influence a landlord's experience. It may lead to feelings that the inspection, once conducted, has been carried out unfairly.

PHAs should make sure to let landlords know how long an inspection will take to schedule and conduct—and then make sure to adhere to these timeframes. Landlords have noted that the uncertainty and inconsistency of scheduling is just as frustrating as long timelines.

Train and Share Information

Changing the perception that inspections are conducted inconsistently starts with ensuring that inspections are conducted in compliance with HUD-established physical inspections standards such as HQS. Continuing education opportunities for currently certified inspections staff ensures that inspectors have the right

information and understand the requirements and importance of performing their duties consistently and fairly.

When reviewing inspections staff training procedures, PHAs should consider the following:

- How often will training be offered? While PHAs will already have training and certification in place for new inspectors, PHAs should determine the need for refresher courses. If a PHA has received an increase in the number of complaints against inspection staff, multiple issue-focused courses might be a good way to get inspectors back on track and make sure they are familiar with all aspects of the inspection process.
- What types of information will be discussed? PHAs should use refresher courses to examine areas where landlords have expressed specific concerns.
- How can customer service be improved? While some areas might be best addressed by a review of policy and regulations, many landlord complaints could be minimized or resolved through enhanced customer service. This is also a good opportunity for inspectors to share issues they have encountered and ways these issues have been successfully resolved. PHAs with only one or two inspectors may want to consider incorporating them into a discussion of customer-service techniques with other PHA staff. They might be surprised that many issues can be de-escalated by providing additional information to landlords. For example, if a landlord feels frustrated due to a unit's failure in an inspection, providing a clear explanation of next steps and referring the landlord to resources such as a PHA video on common deficiencies may reduce frustration.

Perform Mock Inspections

One helpful method for PHAs to improve consistency is to have inspectors review an inspection together, after which they will be asked to compare results and discuss differences. Inspectors could be presented with photos or video of a real or mock inspection or visit a unit as a group.

PHA HIGHLIGHT:

Inspectors are among the PHA staff whom some landlords interact with most frequently. This provides inspectors with a prime opportunity to improve the relationship between the PHA and the landlord. Inspectors who can provide landlords with information above the pass/fail status of their unit may find that a potentially contentious interaction turns out to be positive.

For example, at one PHA, the inspector was able to market other PHA programs and opportunities because he had such a friendly relationship with landlords. inspectors are uniquely positioned to improve relationships with landlords and market other PHA programs. Because of this, it may be useful for inspectors to be familiar with other programs and opportunities that might help landlords.

Perform Quality Control

As a component of training, PHAs should ensure that inspectors are properly implementing what they have learned. This can be accomplished through periodic ride-along visits, where supervisors join inspectors on a number of inspections, as feasible. Quality control inspections are required under 24 CFR 982.405(b). PHAs may want to conduct additional quality control inspections beyond the regulatory minimum to ensure inspectors are consistently

performing inspections if the PHA has noticed inconsistencies between inspectors. Note that this can cause additional burden to the landlord or family who would need to be present. PHAs can also monitor and check in with landlords to see if there have been improvements in areas previously identified as problematic. Areas that continue to be issues can be re-addressed through subsequent training or individual supervision.

Simplify Inspections Across PHAs

Landlords may own properties in multiple PHA jurisdictions and, therefore, may need to work with multiple PHAs when participating in the HCV program. When PHAs require forms or procedures that differ from another PHA, landlords experience confusion and frustration that may lead to dissatisfaction with the HCV program. The flexibility discussed below can be used to enable PHAs to align certain policies or procedures, possibly resulting in less confusion for landlords working with multiple PHAs.

Inspections can be particularly complex for landlords that work with multiple PHAs. Differences in forms, processes, and requirements can add a layer of frustration and sense of unfairness when PHAs appear to have different "rules." If PHAs determine that a group of their landlords often have property in other PHA jurisdictions, the PHAs might consider meeting to discuss ways to make inspections a seamless process for landlords, regardless of the responsible PHA. PHAs could:

- Utilize the same or similar inspections forms.
- Share updates about changes to policies or requirements.
- Make their inspections process similar. For example, both PHAs could enable landlords to certify or otherwise document correction of the same types of deficiencies rather than having a re-inspection. See the following Administrative Inspections Flexibilities strategy.
- Pool inspection resources.

These approaches vary in complexity, ranging from fairly simple to requiring changes to administrative policies and formal memoranda of understanding (MOUs). PHAs that are considering making substantial changes to their inspection process should be sure the changes are allowable and the administrative plans are updated accordingly.

Review Policies and Procedures

As noted in the strategy, Inspections Guidance for Landlords, PHAs should periodically review their inspection policies and procedures. Policies and procedures should be reviewed for:

- Accuracy: Are the policies accurate and up to date? Has new policy or regulations been issued that would necessitate a change? PHAs should check the HUD website for new notices or guidance.
- Clarity: Confusing policies can lead to improper and inconsistent application. PHAs should ensure that their procedures are clear and easy to understand.
- Consistency: Is the material provided to landlords consistent with the PHA's policies and procedures? Is the training provided to inspectors consistent with the PHA's policies and procedures?

STRATEGIES TO FACILITATE EFFICIENCY IN THE SCHEDULING AND COMPLETION OF INSPECTIONS

A critical component of a successful inspection program is ensuring that inspections are scheduled and conducted in a timely manner. The speed in which inspections can be scheduled and conducted can have financial implications for landlords. Long wait times can cause units to remain vacant, causing landlords to lose income. Landlords also spend time and money waiting for inspectors to arrive at their units. These strategies address internal changes that PHAs can take to reduce the amount of time it takes to both schedule and conduct inspections.

There are two main strategies designed to address this issue:

1. **Inspection Scheduling**
2. **Administrative Inspection Flexibilities**

These strategies are designed to target different elements surrounding inspection scheduling, but both are rooted in internal change. One is targeted at streamlining the scheduling process, the other at simplifying the overall process. The strategies depend on PHAs reviewing their practices to see if they can be optimized and, if so, making changes. While landlords might not see the changes being made, if successfully implemented landlords will see a reduction in the time it takes to schedule and conduct inspections.

When approaching these changes, PHAs should gather information on the areas targeted for improvement and then compare them against current policies and procedures to identify areas for change. PHAs might consider focusing on one area at a time. For example, are landlords experiencing greater delays with initial or annual inspections? Are inspections being scheduled in a reasonable timeframe, but inspectors not arriving to the unit at the appointed time? While some activities will address multiple areas of concern, others might be targeted at a single issue.

STRATEGY: INSPECTION SCHEDULING

Analyzing how PHAs schedule and staff inspections for patterns or gaps and making administrative changes to improve efficiency.

Who: All PHAs; Some activities are targeted to PHAs that have inspectors on staff.

Cost: $ $$ $$$

Implementation Considerations: ● **LOW** ○ MEDIUM ○ DIFFICULT

Inspection Scheduling Process Improvements

PHA Process Improvement	Inspection Scheduling
Increase Recruitment	
Increase Retention	X
Improve Responsiveness	X
Improve Tenant-Landlord Relationship	
Improve Inspections Process	X
Minimize Bureaucracy	X

WHAT THIS IS AND WHY IT WORKS: PHAs that have long delays between the time an inspection is requested and subsequently scheduled may find that a slight change in how inspections are scheduled can lead to significant improvements in efficiency. This strategy requires the PHA to gather and analyze internal data, which can be a time-intensive process. Once compiled, however, the data can provide insight into how PHAs can maximize the time spent scheduling and conducting inspections.

Related Strategies:

- Inspections Technology
- Alternative Inspections Policies

IMPLEMENTATION

If the PHA uses an inspection software module or a third-party inspection service, much of the data below may be available through a report and data can be queried to analyze a longer period of time, up to a year or more, to gain big picture trends. PHAs should begin by gathering the following information:

- How are inspections scheduled? Are initial or re-inspections scheduled on a first-come, first-served basis? Are landlords able to select dates and times that work best? Are inspectors assigned by area? By inspection type? How often are re-scheduled inspections requested?
- On average, how much time passes between when an inspection is requested and when it is conducted? Does this vary by the type of

inspection? Are these timeframes in line with the timeframes that the PHA has told landlords they can expect?

- How many inspections are conducted on a weekly basis and what is the breakdown by type? PHAs should review data going back a couple of months to get an accurate picture.
- Are inspectors having issues making it to the property on-time? Why are there delays? How often do inspectors encounter no-shows?

Once this data has been gathered, PHAs may be able to see certain trends or issues.

The PHA may identify that inspectors are spending significant portions of their day commuting. This minimizes the number of inspections that can be completed daily and also increases the risk of delays and missed inspections windows due to unexpected traffic delays. The activities below offer ways that PHAs can minimize the amount of time spent commuting to maximize inspectors' and landlords' time.

Group Inspections: Grouping inspections by ZIP Code or by buildings can minimize travel time for inspections, reducing the potential for travel-related delays. This can help keep inspections on-time as well as increasing overall efficiency. Account for whether the PHA will perform annual or biennial inspections early to accomplish grouping and, if so, communicate these impacts to landlords.

Use Software to Optimize Inspection Routes: PHAs can also invest in software that can create optimal routes for inspections. While software can pose a significant upfront cost, PHAs with large service areas and a large number of units, might find manual grouping by ZIP Code or building challenging. Software is available that can group inspections, optimize travel routes based on real-time traffic, and update landlords with arrival times.

Grouping Inspections by Type: Some PHAs may find that dedicating certain days or times for certain types of inspections may streamline the scheduling process. For example, if a PHA finds that their numbers of initial inspections are low and infrequent, they could dedicate a portion of the day for these, keeping the remainder of the day open for other types of inspections. It should be noted that this type of scheduling is based on current trends and should be adjusted as needed. In the example above, should the PHA see an increase in the number of initial inspections, an adjustment to the scheduling process might be needed. PHAs should also make sure to allow time for emergency inspections.

Inspector Assignments: Depending on the volume and frequency of different types of inspections, PHAs might consider assigning certain types of inspections for individual inspectors. Similar to the activity above, a PHA with a high volume of annual inspections could assign two of their inspectors to conduct annual inspections and leave their remaining inspector available to conduct initial and emergency inspections. Assignments should be reviewed periodically to ensure that they are in line with the current inspection trends.

Create some flexibility in inspectors' schedules with some extra open appointment slots. These would allow for emergency inspections or last-minute landlord appointment requests. They would also allow for people who forgot about an inspection but who may still be available. Make sure inspectors can easily contact the tenant and the landlord so an inspection does not need to be rescheduled if the inspector is still in the area.

STRATEGY: ADMINISTRATIVE INSPECTION FLEXIBILITIES

Reviewing the PHA's current inspection policy to identify where implementing existing administrative flexibilities can simplify the process.

Who: All PHAs; Some activities are targeted to PHAs that have inspectors on staff.

Cost: $ $$ $$$

Implementation Considerations: ● LOW ○ MEDIUM ○ DIFFICULT

Administrative Inspection Flexibilities Process Improvements

PHA Process Improvement	Administrative Inspection Flexibilities
Increase Recruitment	
Increase Retention	X
Improve Responsiveness	
Improve Tenant-Landlord Relationship	
Improve Inspections Process	X
Minimize Bureaucracy	X

WHAT THIS IS AND WHY IT WORKS: There are several flexibilities that PHAs can implement to simplify and expedite the inspection process. PHAs should routinely review their policies to determine if a change might improve and simplify the process both for the PHA itself, landlords, tenants, and inspectors.

The following is a list of flexibilities that PHAs can implement. Incorporating any policy change to the inspection process will necessitate changes to written PHA policies and procedures. Additionally, the flexibilities listed below all have impacts for landlords, whether in the timing/frequency of inspections or the ways that they can conduct inspections and certify repairs. PHAs will need to consider how any change will be communicated to landlords and build adequate time for notification into their implementation timetable.

Related Strategies:

- Administrative Flexibilities to Increase Landlord Satisfactions

Alternative Inspections: PIH Notice 2017-20 Housing Opportunity Through Modernization Act of 2016 (HOTMA) – Housing Quality Standards (HQS) Implementation Guidance includes a provision allowing PHAs to approve an assisted tenancy of a unit prior to the HQS inspection if the property has passed an alternative inspection within the past 24 months. The initial HQS inspection must still take place and the landlord will not receive HAP until the unit is inspected and determined to pass. However, once it is determined that

the unit meets HQS, the landlord will receive retroactive HAP for the period prior to the HQS determination. This can reduce the time that a landlord is not receiving HAP while awaiting an inspection. PHAs that implement this provision must take certain actions regarding their administrative plan and how they notify HUD and landlords. See PIH Notice 2017-20 for additional information.

If an inspection has non-life threatening (NLT) deficiencies, the landlord has 30 days to correct the deficiencies. The PHA may adopt policies that allow for a certification of corrected deficiencies through an alternate means of certification rather than requiring a re-inspection. The alternate means may include submission of photographic evidence that deficiencies are corrected. Additionally, for initial inspections, the PHA may adopt policies that allow for the payment of HAP prior to the correction of NLT deficiencies only.

Biennial (and Triennial) Inspections: Per 24 CFR 982.405, HUD requires that PHAs inspect each unit at least biennially (or triennially for some small rural PHAs). While PHAs are still required to conduct an initial inspection before a landlord receives HAP, a change to biennial (or triennial) inspections can alleviate administrative burden on PHAs, and in turn, the administrative burden on landlords. Moving to biennial or triennial inspections also frees up PHA resources to conduct other inspections more quickly. For more information on adopting biennial inspections, see PIH Notice 2016-05, Attachment K. For more information on triennial inspections, see 85 Fed. Reg. 11318 (Feb. 27, 2020).

Remote, Video-Assisted, or Virtual Inspections: Due to the COVID pandemic, PIH Notice 2020-13 (HA), REV-1 provides PHAs additional flexibilities for conducting inspections to meet HCV program requirements. With these flexibilities, a proxy, or person other than an HQS inspector or PHA staff member, utilizes video technology to show the HQS inspector around the unit, allowing the HQS inspector to complete the inspection remotely. HUD has issued some guidance on remote video inspections in COVID frequently asked questions (FAQs) documents. HUD is working to release guidance specific to conducting remote video inspections (RVI). Based on HUD's future assessments, the remote inspection options may extend beyond COVID-era, potentially becoming permanent part of the inspection protocol. PHAs should look for HUD guidance on how to conduct an RVI that will be issued shortly.

While conducting inspections remotely would involve some upfront planning and training (for both inspectors and landlords), this would potentially allow PHAs to increase the number of inspections completed daily, as travel time would be eliminated. In turn, appointment times/windows could be predicted with greater

New Policy?

Implementing a new inspection policy is a great opportunity for PHAs to reach out to landlords. Whether instruction on the new policy is delivered via video clip, webinar, newsletter, or in-person training, PHAs use the opportunity to improve communication and demonstrate the PHA's commitment to landlord satisfaction.

PHAs can use this opportunity to let landlords know about other changes and also as an outreach opportunity to hear from and interact with landlords. Even if notification is delivered through a static delivery method such as a newsletter, PHAs should include ways that landlords can reach out with questions or concerns.

PHAs should notify landlords about upcoming changes with plenty of lead time to allow for questions.

See Education and Outreach for additional information on how PHAs can provide information on new policy to landlords.

accuracy minimizing the burden on landlords to set aside portions of their day.

See PIH Notice 2020-31 for additional information.

Verifying Deficiencies are Remedied: HUD provided PHAs the flexibility to allow landlords of voucher families to self-certify or otherwise document corrected deficiencies for certain types of inspections. PHAs that have made use of this flexibility have been able to decrease the number of re-inspections. Although landlords are already responsible for making corrections, a policy that enables the PHA to use landlord-provided information to verify that deficiencies have been corrected saves landlords time and money by eliminating the need to schedule and be present at a re-inspection.

PHAs are able to customize this flexibility to meet their needs. For example, PHAs can restrict self-certification to landlords who have a documented history of compliance with HUD-established physical inspections standards or to certain NLT deficiencies (or a maximum number of NLT deficiencies). A PHA may require landlords to submit work orders, bills, or photos as proof of repair. The decisions that the PHA makes must be incorporated into the Administrative Plan.

See PIH Notice 2011-29 and PIH Notice 2013-17 for additional information.