



**U.S. Department of Housing and Urban Development**  
Washington, D.C. 20410

OFFICE OF PUBLIC AND INDIAN HOUSING  
REAL ESTATE ASSESSMENT CENTER

**Inspector Notice No. 2019-01**

**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:** Carbon Monoxide Detection Systems 4.0 Software Documentation Requirements (Inspector Notice No. 2019-01)

**DATE ISSUED:** March 25, 2019

**EFFECTIVE DATE:** April 1, 2019

This notice establishes guidance to all UPCS inspectors who conduct physical inspections of HUD assisted and insured properties about performing a data collection process to determine the prevalence of Carbon Monoxide<sup>1</sup> (CO) detection systems at HUD properties subject to UPCS inspection under the Uniform Physical Condition Standards (UPCS) protocol. This Notice remains effective until amended, superseded, or rescinded.

**Applicability**

The requirements in this Notice apply to physical inspections conducted by federal employees or contract inspectors on behalf of HUD and the Real Estate Assessment Center (REAC). This Notice also applies to HUD assisted and insured properties subject to UPCS inspection (24 CFR § 200.853; HUD Section 236), and other projects involving properties inspected under the REAC physical inspection protocol (24 CFR § 542).

**Background**

As part of the Secretary's efforts to support decent, safe and sanitary housing that is in good repair (pursuant to 24 CFR § 5.703), and REAC's commitment to continuous process improvement of physical inspection standards, this Notice requires the collection of data about the prevalence of CO detection systems in federally assisted and insured housing.

CO poisoning remains a serious issue in housing across the nation. Each year, there are approximately 50,000 emergency hospital visits and more than 400 deaths due to CO poisoning.<sup>2</sup>

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<sup>1</sup> Environmental Protection Agency. What is CO? [https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution#What is CO](https://www.epa.gov/co-pollution/basic-information-about-carbon-monoxide-co-outdoor-air-pollution#What%20is%20CO) January 17, 2017.

<sup>2</sup> Centers for Disease Control and Prevention. "Carbon Monoxide Poisoning Prevention." <https://www.cdc.gov/features/copoisoning/index.html> January 21, 2019.

Because CO is undetectable through sight, smell, sound, or touch, a device is required to determine the presence of high and dangerous concentrations of CO gas in a residence. The detectors are typically installed outside of sleeping areas in units with fuel-fired/burning appliance(s), and/or an attached garage, and installed in bedrooms that contain a fireplace or fuel-fired or burning appliance.

### **Procedures**

This Notice requires inspectors to collect data using the following procedures:

- A. UPCS Inspectors must first identify if a sample building with units contains any fuel-fired/burning appliance, and/or has an attached garage. Inspectors are only to evaluate attributes of the built environment, not tenant furnished items.
- B. If a CO source is identified in a sample building or unit, the Inspector must evaluate each unit inspected for the presence of a CO detector. If a CO detector is present, the inspector must test it for operability.
- C. In the “Building Comments” text box, the Inspector must include a comment with the following information:
  1. That a CO source is present, the number of CO detectors that are missing, the number of CO detectors that are working, and the number of CO detectors that are not working. The values associated with each criterion must add up to the total number of sample units that were inspected. If a value is “0”, the inspector must enter that.
  2. If there are no fuel-fired/burning appliance(s) or attached garage(s) located in the building/unit, the Inspector is to leave the Building Comments box blank.
- D. To simplify the capture of the required information and ensure consistency of analyzing the data, Inspectors must utilize the following format:

**COXP M=# W=# NW=#;**

**COXP** indicates that a source of carbon monoxide is present, **M=#** indicates the total number of CO detectors that are *missing*, **W=#** indicates the total number of CO detectors that are *working* and **NW=#** indicates the total number of CO detectors that are *not working*. The **semicolon** at the end will assist with data retrieval as it will be used to identify the end boundary of the data.

### **Administration**

The presence or absence of a CO detection system is for data collection purposes only. The collection of this data does not affect a property’s inspection score.

If you have questions about this Notice, please contact the Technical Assistance Center (TAC) at 1-888-245-4860 or via email (REAC\_TAC@hud.gov).