

NOTICE FOR PUBLIC VIEW

May 24, 2019 to June 24, 2019

(30 days)

The K.H.R.A. Administrative Plan for the Housing Choice Voucher Program has been revised. The K.H.R.A. Board of Commissioners passed on May 15, 2019 an addition to Chapter 8 Part II pages 8-11 to 8-12 “Streamline Methods for Inspection and Enforcement.” The add information states as follows:

Streamline Methods for Inspection and Enforcement (PIH 2013-17)

HUD recognizes that in the current budgetary climate, KHRA is 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 KHRA continues 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 KHRA.

The use of photos in HQS inspections can be an effective tool for improving monitoring and oversight of KHRA’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. KHRA may 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 KHRA, thus eliminating the need for KHRA to conduct reinspections 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 KHRA can obtain sufficient verification through other means. In the case of an inspection for initial occupancy of a unit, the KHRA 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 KHRA 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.

HUD recognizes that some PHAs already use 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. KHRA will use the following for 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 KHRA cannot require HCV owners to submit photos of corrected HQS violations, it can be an effective and efficient way for corrections to be verified.

KHRA chooses to document an HQS inspection beyond specific HQS deficiencies, may 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 KHRA when 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. KHRA will ensure that these photos remain secure and are used only by staff or others needing access for purposes of the HQS

inspection. The photos may remain within a secure file as long as a family is receiving assistance in the specific unit.