



Commonwealth of Massachusetts DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT

Charles D. Baker, Governor ♦ Karyn E. Polito, Lieutenant Governor ♦ Jennifer D. Maddox, Undersecretary

PHN 2022-10

To: All Local Housing Authority (LHA) Executive Directors
From: Robert Garrett, Facilities Management Supervisor
Re: Revised PMR Maintenance Metrics
Date: June 14, 2022 (Updated September 28, 2022)

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As outlined previously in [Public Housing Notice \(PHN\) 2021-13](#), the Department of Housing and Community Development (DHCD) will update Performance Management Review (PMR) criteria as it relates to Facilities Management. Beginning with the 6/30/22 FYE cohort, DHCD will reduce certain aspects in relation to the administrative review of work order systems while expanding the scope of physical inspections at your local housing authority (LHA). Please see PHN 2022-09 for how these integrate into other changes in the upcoming 2022 PMR cycle (6/30/22-3/31/23).

The changes reflected in the PMR are the direct result of many collaborations between DHCD, LHA Executive Directors and Maintenance staff, with a collective goal of more accurately assessing LHA maintenance operations and physical conditions within local housing authorities (LHAs) across the Commonwealth.

KEY CHANGES:

- Number of maintenance criteria has been reduced from fourteen (14) to eight (8).
- Several PMR ratings will now be generated based on the number of [health and safety](#) findings cited during DHCD physical inspection of LHA properties.
- DHCD Facilities Management Specialists will now inspect common areas, building exteriors, maintenance workshops, mechanical rooms, as well as units.
- DHCD will reduce the amount of paperwork required to assess LHA work order administration.
- LHAs will have the ability to upload documents in advance of the PMR site visit, utilizing a new DHCD Facilities Management software application. Additional details will be announced soon.



Executive Directors should reference this guidance document and share with applicable staff to help your LHA prepare and succeed on the PMR.

There are four (4) main components to the revised Facilities portion of the PMR:

- [LHA Inspection Standards and Practices](#)
- [LHA Vacancy Turnover Standards and Practices](#)
- [LHA Preventive Maintenance Standards and Practices](#)
- [LHA Work Order Types and Systems](#)

The components listed above have several rated criteria associated with them. In total, there are eight (8) rated PMR criteria which are outlined generally in the table below.

COMPONENT	Rated Criteria	General Summary
1	100% Unit Inspections	All units inspected at LHA during FY under review. <i>Corrective Action if less than 100% of units inspected</i> ¹
1	LHA Inspection Reports/Work Orders	Any Deficiencies/Lease Violations associated with sample Inspection Reports have generated work orders/correspondence and work is completed within established timeframe or moved to deferred status. <i>Corrective Action if any EHS deficiencies overlooked or multiple non-EHS deficiencies overlooked (based on LHA size)</i>
1	Accuracy of LHA Inspections	FMS Physical Inspection of unit based on review of sample inspection reports. <i>Corrective Action if 667- Equal to or greater than 3 EHS Deficiencies 705/200- Equal to or Greater than 4 EHS Deficiencies</i>
2	Vacancy Turnover Work Orders	All Vacant Units have work orders that itemize performed work. Work is completed within established timeframe or unit has an approved waiver. <i>Corrective Action if Vacancy Work Orders are not created, tracked and reported for every unit OR Vacancy Work Orders are not Maintenance Ready and exceed 45 days for 667 or 60 days for 200/705 and have no approved waiver.</i>
2	Accuracy and Standard of Vacancy Turnovers	FMS Physical Inspection of maintenance ready unoccupied unit or unit occupied within FY under review. Inspection of unit based on review of sampled vacancy work orders. <i>Corrective Action if 667- Equal to or greater than 3 EHS Deficiencies 705/200- Equal to or Greater than 4 EHS Deficiencies</i>
3	LHA Preventive Maintenance Schedule Accuracy and Implementation of Preventive Schedule	FMS Physical Inspection of LHA exteriors, common areas, mechanical rooms, & equipment based on review of LHA preventive maintenance schedule. DHCD will conduct these inspections at each building where it conducts a unit inspection. <i>Corrective Action if 667- Equal to or greater than 3 EHS Deficiencies 705/200- Equal to or Greater than 4 EHS Deficiencies</i>
4	Emergency Work Orders	Emergency work orders are created, tracked, reportable and completed within forty-eight (48) hours. <i>Corrective Action if work not completed within 48 hours OR less than 80% of work orders not created and tracked administratively.</i>
4	Requested Work Orders	Requested work orders are created, tracked, reportable and completed within fourteen (14) days or moved to DM/CIP. <i>Corrective Action if requested work orders under review are not completed within 14 days or added to DM/CIP.</i>

COMPONENT 1:

INSPECTION STANDARDS AND PRACTICES

Every LHA should have a strong inspection program that serves to ensure their residents live in safe and sanitary housing. By conducting regular, methodical and thorough inspections, LHAs have far more control over maintenance deficiencies and/or lease enforcement, which will help prevent unanticipated emergencies, insurance losses and claims. DHCD considers inspections to be a core responsibility of an LHA and critical to its mission of preserving its affordable housing stock and providing safe and sanitary housing.

PMR Rated Criteria #1: All LHA units were inspected once per the fiscal year under review.

DHCD staff will review a sample of inspection reports ([based on LHA size – see Table 2](#)) to determine compliance and the result will generate a PMR rating for this criterion.¹

Ideally, LHAs should schedule and conduct unit inspections throughout the year. DHCD, however, recognizes that the challenges at an LHA may vary based on their size and bandwidth.

When developing or reviewing an inspection program, LHAs should consider an approach that will match the anticipated volume of inspection work orders with the capacity of its' workforce.

Inspections must be recorded on an acceptable form, whether electronic or paper. Inspection forms must clearly list the date, development name/unit number and the physical components of each building/room. Inspections should be conducted in a methodical fashion, by either moving clockwise or counterclockwise through each room, checking every ceiling, floor, wall and all their associated components (fire safety, plumbing, heating, electrical, lease violations) for deficiencies.

Every recorded deficiency should clearly note:

- Action (EX. Repair, Replace, Re-caulk, Change, Clean)
- Item (EX. Window, Floor, Faucet, Filters)
- Location (EX. Kitchen, Bathroom, Bedroom)

PMR RATED CRITERIA #2: All deficiencies recorded on an inspection report must generate a corresponding work order and/or lease violation.

Please note: If the LHA chooses, non-emergency inspection work order items may be consolidated or “bundled” onto a single work order for efficiency purposes. LHAs must complete all inspection work orders within thirty (30) days or move them to a deferred status.

Please note: Exigent Health and Safety (EHS) deficiencies cannot be deferred. DHCD staff will review a sample of inspection reports and associated work orders and/or lease violations ([based on LHA size - see Table 2](#)) to determine compliance and the result will generate a PMR rating for this criterion.

¹ FMS may allow, at their discretion, substitutions of units that could not be inspected by the LHA during the FY under review, at the time of the PMR. Examples of allowable substitutions include: COVID-19 concerns, documented refusals of entry, ongoing capital projects, ongoing hoarding issues and/or infestations. If the LHA cannot inspect a unit during the fiscal year, please be prepared to provide DHCD relevant documentation that will support the reasoning for any substitution.

PMR RATED CRITERIA #3: FMS Physical Inspection of unit based on review of sample inspection reports.

DHCD will review a sample of inspection reports and work orders to assess the accuracy of the LHA inspection program. Following this administrative review, DHCD staff will select a sample of units for physical inspection ([based on LHA size - see Table 2](#)). The inspection will assess discrepancies between the FMS and LHA's assessment of unit conditions.²

DHCD staff recognize that discrepancies may exist and will focus solely on a large-scale disparity between the inspections. Simply put, if every LHA inspection report cites "no deficiencies" within a unit, it would be reasonable to expect the unit to be in good condition. It would be concerning to find numerous health and safety deficiencies that could not have reasonably occurred between the time of the DHCD inspection and the time the LHA inspection was conducted.

[Please see the attached health and safety addendum that lists common health and safety deficiencies cited by inspectors.](#)

COMPONENT 2: **LHA VACANCY TURNOVER STANDARDS AND PRACTICES**

Timely and efficient vacancy turnover is a key component to good facilities management. Additionally, every day a unit is vacant is a day of rent lost. An efficient system is dependent upon your LHAs ability to develop and maintain a consistent vacancy turnover process and/or procedure(s) that ensure each unit is re-occupied as soon as possible and according to the minimum standards set within [Chapter II of the MA State Sanitary Code](#).

The overarching goal of the turnover process is the rapid re-occupancy of a vacant unit while also ensuring the condition is both safe and sanitary for the incoming tenant(s).

A successful turnover procedure is a collaborative process involving both LHA administrative and maintenance staff. It is important to note that the process is not a one-size-fits-all formula; LHAs should strive to develop a consistent procedure that works well for their agency. However, in general, the vacancy turnover process should include several basic steps including:

- 1) Move-out inspection with the vacating tenant;
- 2) Report the vacancy utilizing DHCD online reporting system;
- 3) Change locks;
- 4) Vacant unit inspection (LHA assesses the needed maintenance repairs, estimate costs and timeline for completion, request waiver if needed);
- 5) Maintenance or Contractor performs the necessary work;
- 6) LHA performs quality control inspection prior to lease-up;
- 7) Move-in inspection with new tenant.

² DHCD will generate ratings for this criterion through the total number of health and safety findings cited by the DHCD inspector. Please note: Common maintenance deficiencies such as paint peeling or a missing pop-up assembly in a bathroom sink will be cited by the inspector but will not impact your rating.

Every vacancy turnover is an extremely valuable opportunity for the LHA to comprehensively inspect the unit for any physical needs that might not have proved apparent while the unit was previously occupied. While LHAs do not always have sufficient time and resources to perform major capital improvements during the vacancy turnover, they should be using the process as an opportunity to thoroughly assess the current and/or future needs of the unit and/or property.

DHCD will review data from a sample ([based on LHA size – see Table 2](#)) of vacancy work orders to assess the accuracy of the LHA vacancy turnover program. As part of the vacancy turnover process, LHAs are expected to document every vacancy and compile all work performed by maintenance or other contractors onto a vacancy work order.

Preferably, LHAs should compile this work onto a single work order that itemizes ALL performed work (large LHAs may have an alternate approach due to specialized staffing or unions). That work order should be created at the time that the LHA obtains control of the unit and should be completed and closed out within thirty (30) calendar days of that initial date.

If the LHA determines they are unable to complete the work within that thirty (30) day timeframe, they may submit a vacancy waiver request to DHCD, providing any required documentation and/or explanation as to why the vacancy turnover cannot be completed within the allotted timeframe.

PMR RATED CRITERIA #4: All Vacant Units have work orders that itemize performed work. Work is completed within established timeframe or unit has an approved waiver.

DHCD staff will review a sample of vacancy work orders ([based on LHA size – see Table 2](#)) to determine compliance and the result will generate a PMR rating for this criterion. Improper documentation of vacancy work orders and untimely completion of a vacancy turnover, without an approved waiver, could result in the assessment of vacancy fees and ultimately in a corrective action PMR rating.

PMR RATED CRITERIA #5: FMS Physical Inspection of maintenance ready unoccupied unit or unit occupied within FYE under review. Inspection of unit based on review of sampled vacancy work orders.

Following this administrative review of vacancy work orders, DHCD staff will select a sample of units for physical inspection ([based on LHA size – see Table 2](#)). The goal of this inspection is to identify a reasonable parallel between the DHCD inspector's findings and the LHA's standard of vacancy turnover.

DHCD staff recognize that discrepancies or tenant caused conditions may exist and are focused solely on a large-scale disparity between the work performed by the LHA at the time of vacancy and the condition of the unit observed at the time of the DHCD inspection.³

Please see the attached [health and safety addendum](#) that lists common health and safety deficiencies cited by inspectors.

³ Ratings for this criterion will be generated through the total number of health and safety findings cited by the DHCD inspector. Please note: Common maintenance deficiencies such as paint peeling or a missing pop-up assembly in a bathroom sink will be cited by the inspector but will not impact your rating.

COMPONENT 3:

LHA PREVENTIVE MAINTENANCE STANDARDS AND PRACTICES

Every LHA should have a comprehensive Preventive Maintenance Plan and schedule of work that includes all the tasks necessary to maximize and preserve existing LHA components. Examples include: the servicing of boilers, changing filters in air source heat pumps, fire alarm testing, cleaning gutters, or simply changing the oil in an LHA vehicle. Many items will occur on an annual basis, while others will require more frequent servicing. Some tasks may be performed in-house and other work may rely on service contracts, utilizing licensed or specially trained professionals.

The schedule of work developed by your LHA should encompass twelve (12) months and be comprehensive, by development, not only describing the necessary task, but also citing the frequency and the designated party responsible for completing the required work.

LHA maintenance staff should become familiar with required preventive maintenance on new equipment installations, as dictated by the manufacturer and/or industry standards. Considerations should also be given to any reasonable accommodation(s) requiring preventive maintenance and if warranted, they should be reflected in the LHA's preventive schedule of work. During the PMR process, DHCD staff will review your LHAs adopted preventive schedule of work and cross reference it for accuracy against the physical inspection conducted at the time of the PMR.

PMR RATED CRITERIA #6: LHA Preventive Maintenance schedule accurately reflects all necessary work to maximize the life of LHA components.

In order to assess your LHA's ability to implement an effective preventive maintenance schedule of work, DHCD will conduct more extensive inspections of LHA properties than in past PMRs, including but not limited to; building exteriors and grounds, common areas, mechanical rooms, maintenance workshops and building systems. These inspections will assess health and safety⁴ related discrepancies between the DHCD inspector's findings and the LHA's management of preventive maintenance tasks and upkeep.

Please see the attached health and safety addendum that lists common health and safety deficiencies frequently cited by inspectors.

⁴ Ratings for this criterion will be generated through the total number of health and safety findings cited by the DHCD inspector. Examples of health and safety deficiencies include: a fire alarm panel in trouble, inoperable emergency lighting, missing/inoperable smoke/CO detector, missing knockouts on electrical boxes or panels, missing wall plates, exposed wiring, etc. Common non-health and safety maintenance deficiencies will be cited by the inspector but will not impact your rating.

To assist your LHA with the development of a sound preventive maintenance schedule, DHCD recommends reviewing your current preventive schedule of work and verifying that the six (6) recommended categories (in bold below) are represented. Adjustments should be made to reflect any missing categories and adding any applicable items within each category to your preventive schedule, as necessary, and at the discretion of the LHA. Please note: The following items are not all inclusive.

LIFE AND SAFETY SYSTEMS

Examples:

- * Alarm System
- * Elevators
- * Exit Signs
- * Emergency Lighting
- * Fire Pumps/Sprinklers/Suppression
- * Fire Hydrant
- * Fire Extinguishers
- * Generators
- * Security Systems

DWELLING UNIT

Examples:

- * Annual Inspections
- * Smoke/CO Battery Replacement
- * Pest Control
- * HVAC/ASHP Filters and Cleaning

BUILDING ENVELOPE

Examples:

- * Roofs
- * Windows and Doors
- * Gutters and Downspouts
- * Siding
- * Flashing
- * Foundation
- * Lighting
- * Pest Control

SITE AND GROUNDS

Examples:

- * Walkways
- * Lighting
- * Roads
- * Catch Basins and Storm Drains
- * Trees and Shrubs
- * Lawns and Gardens
- * Dumpsters and Trash Removal

MECHANICAL, ELECTRICAL AND BUILDING SYSTEMS

Examples:

- * Boiler Service
- * Condensate Pumps
- * HVAC Systems
- * Air Source Heat Pumps
- * Domestic Water
- * Electrical Panels/Components
- * Elevators
- * Sanitary Lines
- * Sump Pumps
- * Vents

VEHICLES AND EQUIPMENT

Examples:

- * Trucks
- * Lawnmowers
- * Snowblowers
- * Plows
- * Tools

Please contact your assigned Facilities Management Specialist (FMS) for further assistance in the development of a sound Preventive Maintenance Plan that will meet the needs of your LHA and the requirements of the PMR.

COMPONENT 4:

LHA WORK ORDER TYPES AND SYSTEMS

A **work order system** is an organized set of processes and procedures that uses work orders to identify needed repairs, track, prioritize and schedule work assignments. An effective work order system that is maintained will give your LHA the ability to work more efficiently, reduce costs, assist in the ordering of supplies, and help safeguard against overlooked work items that could lead to an emergency.

A **work order** is a document generated from your work order system. The generation of a work order should be viewed as a precondition, that constitutes an official authorization by the LHA to perform work. Work orders are used to:

- * Initiate;
- * Prioritize;
- * Track;
- * Schedule;
- * Document ALL work performed at your LHA.

Thorough documentation of work orders aims to improve the quality of work performed and will assist your LHA in delivering the best possible services to the residents of your LHA.

Every LHA must have a work order system that creates, tracks, prioritizes and labels work orders as the following types:

- | | |
|---------------------|--------------------|
| * Emergency | * Requested |
| * Vacant | * Routine |
| * Preventive | * Deferred |
| * Inspection | |

Additionally, every LHA must be able to create separate work order reports for each of the above listed work order types.

[PMR RATED CRITERIA #7 – All Emergency work orders under review are created, tracked, reported and completed within 48 hours.](#)

Emergencies should be narrowly defined as only those conditions which are immediately threatening to the life or safety of your residents, staff, or structures. If a deficiency meets this definition any time of day, it needs to be identified as an emergency. All emergency work items identified within your LHA Emergency Response system must be created as an emergency work order twenty-four (24) hours a day.

As a requirement of the PMR, every LHA must be able to produce individual Emergency work orders and comprehensive Emergency work order reports that include the following information for each work order listed:

- * Work Order number
- * Date of Emergency (work order should be created on that date)
- * Date completed
- * Location
- * Labeled as an Emergency
- * Description of the issue and work completed
- * All Emergency work orders listed on the report should be closed out within forty-eight (48) hours⁵

PMR RATED CRITERIA #8 - All requested work orders under review are created, tracked, reported. All work is complete within fourteen (14) days or added to DM/CIP.

LHAs are required to create “tenant request” work orders in their work order system, generally encompassing any work requested by a tenant and performed by the LHA, inside the tenant’s unit.

As a requirement of the PMR, every LHA must be able to produce individual “Requested” work orders and comprehensive “Requested” work order reports that include the following information for each work order listed:

- * Work Order number
- * Date of Tenant Request (work order should be created on that date)
- * Date completed
- * Location
- * Labeled as an “Requested”
- * Description of the issue and work completed
- * All Requested work orders listed on the report should be closed out within fourteen (14) day

⁵ Please note: In certain situations, the LHA will complete emergency work within forty-eight (48) hours but additional non-emergency work will still be required. These emergency work orders should be closed out and non-emergency work orders should be generated. Example: a broken window. Maintenance staff respond within forty-eight (48) hours and complete the emergency work,

removing glass and installing plywood, eliminating the immediate threat to health, safety and/or structure. The emergency work should be interpreted as complete and the replacement window should now become a non-emergency maintenance item.

TABLE 1: Maintenance Metric Scoring Criteria

	CRITERIA	NO FINDINGS	OPERATIONAL GUIDANCE	CORRECTIVE ACTION
1	100% of units inspected during FYE under review* *Substitution of certain units allowed at discretion of FMS.	All Units Inspected	No Operational Guidance for this criterion	Less than 100% of sample unit inspections were conducted once during the FYE under review.
2	Unit inspection reports create, track, and report work orders for inspection repairs, and complete WOs within 30 days or add to DM/CIP Note – Health and Safety work orders cannot be deferred to DM/CIP.	All inspection work orders/lease violations are created, tracked, and reported. AND Non-health and safety work orders for inspection repairs/lease violations are completed/addressed within 30 days or added to DM/CIP. AND Health and safety work orders for inspection repairs/lease violations are completed/addressed within 48 hours.	All health and safety inspection work orders/lease violations are created, tracked, reported and completed within 48 hours. AND LHA failed to create, track, or report no more than 1 or 2 (based on LHA size) non-health and safety deficiencies. OR LHA failed to complete any non-health and safety work orders appropriately (30 days, DM/CIP).	Any health and safety inspection work orders/lease violations are not created, tracked, reported or completed within 48 hours. OR 1 of the following is true. LHA failed to create, track, or report: *More than 1 non-health and safety deficiency (small LHA) * More than 2 non-health and safety deficiencies (medium/large LHA)
3	Unit inspection reports accurately reflect necessary repairs Findings if that number of Exigent Health Safety (EHS) at ANY unit inspected at site visit.	667 – Less than 2 EHS Deficiencies 705/200 – Less than 3 EHS Deficiencies	667- 2 EHS Deficiencies 705/200- 3 EHS Deficiencies	667- Equal to or greater than 3 EHS Deficiencies 705/200- Equal to or Greater than 4 EHS Deficiencies
4	Vacancy Turnover Work Orders: Work orders created for every vacancy and completed within 30 days (or waiver requested).	Vacancy Work Orders are created, tracked and reported for every unit and reflect all work completed in unit. AND Vacancy Work Orders are Maintenance Ready in - c.667 units: Less than or equal to 30 days or have approved waiver - c.200/705 units: Less than or equal to 45 days or have approved waiver	Vacancy Work Orders are created, tracked and reported for every unit. AND Vacancy Work Orders do not reflect all work completed in unit (e.g., work order says “turned over unit” but lacks further detail). OR	Vacancy Work Orders are not created, tracked and reported for every unit. OR Vacancy Work Orders are not Maintenance Ready in - c.667 units: More than 45 days and no approved waiver

			<p>Vacancy Work Orders are Maintenance Ready in</p> <ul style="list-style-type: none"> - c.667 units: More than 30 days but less than or equal 45 days and no approved waiver - c.200/705 units: More than 45 days but less than or equal to 60 days and no approved waiver 	- c.200/705 units: More than 60 days and no approved waiver
5	<p>Vacancy turnover work orders accurately reflect necessary repairs</p> <p>Findings if that number of EHS at ANY unit inspected at site visit. If not, tenant occupied, threshold is one fewer EHS per unit.</p>	<p>667-Less than 2 EHS Deficiencies</p> <p>705/200- Less than 3 EHS Deficiencies</p>	<p>667- 2 EHS Deficiencies</p> <p>705/200- 3 EHS Deficiencies</p>	<p>667- Equal to or greater than 3 EHS Deficiencies</p> <p>705/200- Equal to or Greater than 4 EHS Deficiencies</p>
6	<p>LHA Preventive Schedule Accuracy and Implementation of Preventive Schedule: LHA Preventive Maintenance schedule accurately reflects all necessary work to maximize life of LHA components.</p> <p>Findings if that number of EHS at ANY building inspected at site visit.</p>	<p>667-Less than 2 EHS Deficiencies</p> <p>705/200- Less than 3 EHS Deficiencies</p>	<p>667- 2 EHS Deficiencies</p> <p>705/200- 3 EHS Deficiencies</p>	<p>667- Equal to or greater than 3 EHS Deficiencies</p> <p>705/200- Equal to or Greater than 4 EHS Deficiencies</p>
7	<p>Emergency work orders created, track, and report in accordance with PMG and necessary repairs are completed within 48 hours</p>	<p>All emergency work orders under review are created, tracked, reported and completed within 48 hours.</p>	<p>All Emergency Work Orders completed within 48 hours.</p> <p>AND</p> <p>Less than 100%, but greater or equal to 80%, of Work Orders under review are correctly created, tracked and reported.</p>	<p>Not all Emergency Work Orders are completed within 48 hours.</p> <p>OR</p> <p>Less than 80% of Work Orders under review are correctly created, tracked and reported.</p>
8	<p>Requested Work Orders are created, tracked and reported. All work orders are completed within 14 days or added to DM/CIP</p>	<p>All requested work orders under review are created, tracked, reported. All work is complete within 14 days or added to DM/CIP.</p>	<p>All Requested Work Orders completed within 14 days or added to DM/CIP.</p> <p>AND</p> <p>Less than 100% of Work Orders under review are correctly created, tracked and reported.</p>	<p>Not all requested work orders under review are completed within 14 days or added to DM/CIP.</p>

TABLE 2: Required Reporting for Adjusted Maintenance Metrics

LHA Size	Reporting Requirements
Small	<ul style="list-style-type: none"> • 5 inspection reports + • 2 vacancy work orders* • 3 unit + building inspections (FMS Physical Inspection)
Medium	<ul style="list-style-type: none"> • 7 inspection reports + • 3 vacancy work orders* • 4 unit + building inspections (FMS Physical Inspection)
Large	<ul style="list-style-type: none"> • 10 inspection reports + • 5 vacancy work orders* • 6 unit + building inspections (FMS Physical Inspection)

*Dependent upon number of vacancies during FYE under review. If required vacancy work orders are not available, (due to a shortage in vacancies within the FYE under review) FMS will substitute vacancy work orders with inspection reports.

Health and Safety Addendum

The following are examples of common health and safety deficiencies cited by DHCD inspectors. These are provided for general information purposes only and should not be construed as a comprehensive or exhaustive list.

Life and Safety Systems	
Item	Deficiency
Fire Alarm Panel	Fire Alarm panel is in trouble
Fire Extinguishers	Fire extinguisher pressure gauge reads over or undercharged Fire extinguisher service tag is missing, illegible, or expired Fire extinguisher is missing
Smoke/CO detectors	Smoke/CO alarm does not produce an audio or visual alarm when tested, Smoke detector is missing
Exit Signs	Exit sign is missing, obstructed, damaged, not securely affixed or lighted exit sign does not illuminate.
Emergency Lighting	Emergency lighting not operable
Other Hazards	'Other'' includes hazards that are not specifically defined elsewhere
Dwelling Unit	
Item	Deficiency
Convection/Radiant Heat System Covers	One (1) cover is missing or substantially damaged, allowing contact with heating/surface elements or associated fans.
Entry/Bathroom Doors	At least one (1) bathroom door or entry door is not functioning or cannot be locked because of damage to the frame, header, jamb, threshold, lintel, or trim.
Insect/rodent infestation	Evidence of infestation of insects, roaches and ants, throughout a unit or room, especially in food preparation and storage areas. Evidence of rodents, rat or mouse holes, or droppings.
Exposed Electrical Conductor	Electrical conductor is not enclosed or properly insulated (e.g., damaged sheathing, open port, missing knockout, missing outlet or switch cover, missing breaker or fuse, or missing lightbulb) - An opening or gap is present and measures greater than ¼ inch
Missing Outlets/Switches	An outlet, switch or both are missing.
Missing/Broken Cover Plates	A cover plate is missing, which causes wires to be exposed.
Flammable Storage	Flammable materials or combustible materials are improperly stored near a heat or electrical source, causing the potential risk of fire or explosion.
Tripping Hazards	Tread or stair surface is damaged or missing – Items stored on stairways
Blocked Egress	The exit cannot be used, or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage or other conditions
Pull Cords/Call for Aid	Pull cord is missing (i.e., evidence of prior installation, but now not present or is incomplete) - Pull cord end is higher than 6 inches off the floor - A call-for-aid system does not emit sound or light or send a signal to the annunciator - Call-for-aid system is blocked
Stove	Missing anti-tip bracket Flammables stored in oven or on stovetop Excessive accumulation of grease
Mold/Mildew	On one (1) ceiling or wall, approximately more than one (1) sq. ft. of its surface has been substantially saturated or damaged by mold or mildew. The ceiling surface may have failed.
Garbage/Debris	Too much garbage has gathered, more than the planned storage capacity
Hot Water	DHW temp below 110 degrees or exceeds 130 degrees

Clogged Drains	The fixtures are not usable, because the drain is completely clogged or shows extensive deterioration.
Lighting	In more than 2 rooms, a permanent light fixture is missing or not functioning, and no other switched light sources are functioning in the rooms.
Smoke/CO Detectors	A single detector is missing or does not function - Missing/inoperable detector
Windows	Cracked/broken/missing windowpanes – window cannot be opened – window not lockable
Clothes Dryer Exhaust Ventilation	Dryer transition duct is detached or missing – Dryer exhaust ventilation system has restricted airflow – Dryer transition duct is constructed of unsuitable material
Other Hazards	‘Other’ includes hazards that are not specifically defined elsewhere

Building Envelope

Item	Deficiency
Walkways/Steps	Broken/missing handrail for 4 or more stairs - Tread or stair surface is damaged or missing
Emergency Fire Exits	Blocked or unusable due to damage to door or frame, damage to hardware
Windows	Cracked/broken/missing windowpanes – window cannot be opened – window not lockable
Clothes Dryer Exhaust	Electric dryer exhaust ventilation system has restricted airflow
Other Hazards	Includes hazards that are not specifically defined elsewhere

Site and Grounds

Item	Deficiency
Walkways/Steps	Broken missing handrail – tripping hazards
Lighting	Missing/broken light fixtures
Parking Lots	Tripping hazards – holes or cracks more than 3/4”
Vegetation	Plants have visibly damaged a component, area, or system of the property or have made them unusable/impassable
Refuse Disposal	Excessive Garbage\debris around dumpster areas or garbage is stored in areas not sanctioned for storing garbage/debris
Other	Other hazards not specifically defined elsewhere

Mechanical, Electrical and Building Systems

Item	Deficiency
Electrical System	A fixed obstruction or item of sufficient size and weight that can delay or prevent access to any panel board or main power switch in an emergency. Breakers have carbon on the plastic body, or the plastic body is melted and scarred. - Flammable Materials stored near electrical panels - liquid stains, rust marks, or other signs of corrosion on electrical enclosures or hardware. – missing breakers/fuses or gaps 1/4” or larger - The cover is missing from any electrical device box, panel box, switch gear box, or control panel with exposed electrical connections
Leaking Central Water Supply	Water leaking from any water system component, including valve flanges, stems, bodies, hose bibs, or any domestic water tank or its pipe or pipe connections. - This includes both hot and cold-water systems
Misaligned Chimney/Ventilation System	Misalignment that may cause improper or dangerous venting of exhaust gases.
Missing Pressure Relief Valve	The pressure relief valve on the central hot water heating system is missing or does not extend to the floor.
Boiler/Pump/Cooling System Leaks	Coolant, water or steam is escaping from unit casing and/or pump packing/system piping.

Broken/Leaking/Clogged Pipes or Drains/Sanitary System	A drain is clogged or that components of the sanitary system are leaking - evidence of standing water, puddles, or ponding, a sign of leaks or clogged drains. Can include sources such as domestic plumbing fixtures, floor drains, and other area drains. Consists of floor drains and traps, collection sumps, sewage ejectors, sewage pumps, collection piping, fittings, valves and supports.
Elevators	The elevator will not ascend or descend. - The elevator door will not open or close. - The elevator door opens when the cab is not there. - The elevator does not function at all.
Other Hazards	‘Other’ includes hazards that are not specifically defined elsewhere
General Health and Safety	
Item	Deficiency
Air Quality	Indoor/outdoor spaces where high levels of sewer gas, fuel gas, mold, mildew or other harmful pollutants are present,
Emergency/Fire Exits	Blocked/Unusable (Emergency/Fire Exits - Missing Exit Signs - The exit cannot be used, or exit is limited because a door or window is nailed shut, a lock is broken, panic hardware is chained, debris, storage or other conditions.
Flammable/Combustible Materials— Improperly Stored	Flammable materials or combustible materials are improperly stored near a heat or electrical source, causing the potential risk of fire or explosion. Flammable or combustible materials may include, but are not limited to, gasoline, paint thinners, kerosene, propane, paper, boxes, etc.
Sharp Edges	Any physical defect that could cause cutting or breaking human skin or other bodily harm, generally in commonly used or traveled areas.
Tripping	Any physical defect that poses a tripping risk, generally in walkways or other traveled areas. Typically, the defect must present at least a three-quarter inch deviation.
Other Hazards	Includes hazards that are not specifically defined elsewhere

Resources:

[DHCD Public Housing Notices](#)

[MA State Sanitary Code](#)

[MA Fire Code 527 CMR 1.00](#)

[MA General Laws Chapter 148: Fire Prevention](#)

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