MEMORANDUM FOR: All Regional and Satellite Directors
All Operations Directors
All Contract Administrators
All Multifamily Field Counsel

FROM: Nancie-Ann Bodell, Director, Office of Asset
Management and Portfolio Oversight, HTN

SUBJECT: New UPCS Inspector Protocol Concerning Bed Bug Infestation

The Department is amending the inspection protocol requirements to be followed by all
UPCS inspectors who conduct physical inspections of HUD assisted and insured properties. The
amended inspection requirements are applicable to all properties that are subject to UPCS physical
inspections where bed bugs are suspected or reported. The detailed procedures that an inspector
must follow are described in Inspector Notice No. 2016-01 attached. Please pass this on to all
owners and agents in your jurisdiction who are subject to UPCS inspections.

In 2010, the Department issued Inspector Notice 2010-01 establishing inspection protocol
requirements when an inspector is informed of bed bugs at a property that is being inspected.
Those requirements addressed reporting of bed bugs and the conduct of inspections at these
properties. This Notice amends, in part, those inspection protocol requirements and now requires
inspectors to enter all units in which bed bugs are reported.

Researchers through HUD’s Office of Lead Hazard Control and Healthy Homes have
concluded after conducting thousands of inspections that the likelihood of bed bug transfer to an
inspector from an infested unit is remote. Based on this body of research HUD is amending the
inspection protocol to require the inspection of all units in the sample, including those reported to
have bed bugs.

The presence and the treatment of bed bugs on a property will not be scored in the UPCS
inspection. If you have any questions regarding this matter, please contact Brandt Witte, at
(202) 402-2614.

Attachment
Inspector Notice No. 2016-01

TO:        All HUD Inspectors Certified to conduct Uniform Physical Condition Standards (UPCS) Inspections

FROM:     James E. Cunningham, Jr., Public and Indian Housing Real Estate Assessment Center, Inspector Administration (IA)

SUBJECT:  UPCS Inspector Protocol
          Bed Bug Infestation

DATE ISSUED:  January 21, 2016

EFFECTIVE DATE:  February 1, 2016

This notice amends the inspection protocol requirements to be followed by all UPCS inspectors who conduct physical inspections of HUD assisted and insured properties. These amended inspection requirements are applicable to all properties, subject to UPCS physical inspections, reported to have or suspected of having bed bugs.

Background

In 2010, due to the reemergence of bedbugs, REAC issued Inspector Notice 2010-01 establishing inspection protocol requirements when an inspector is informed of bed bugs at a property that is being inspected. Those requirements addressed reporting of bed bugs and the conduct of inspections at these properties. This Notice amends, in part, those inspection protocol requirements and now requires inspectors to enter all units in which bed bugs are reported.

Researchers through HUD’s Office of Lead Hazard Control and Healthy Homes have concluded after conducting thousands of inspections that the likelihood of bed bug transfer to an inspector from an infested unit is remote. Bedbugs are nocturnal and usually hide on upholstered furniture or beds. They are not very active and do not quickly respond to a human host during the day. Furthermore, an individual’s movement in a unit during inspection makes it even more difficult for bed bugs to find a host. As such, the threat to inspectors is infinitesimally low for bed bugs to be carried out on the inspector following a routine inspection.

---

² This Notice replaces Inspector Notice 2010-01 issued September 1, 2010.
Based on this body of professional experts’ judgment and recommendations, and HUD’s continual improvements to its inspection processes, REAC is issuing this notice amending the inspection protocol to require the inspection of all units in the sample, including those reported to have bed bugs.

**Procedures:**

A. Effective February 1, 2016, inspectors are required to report the presence or existence of bedbugs at any property being inspected and enter any unit reported to have bed bugs that is part of the sample generated.

B. Before beginning the inspection, when the inspector meets with the property representative, the inspector shall:

1. Inquire of the property representative or management agent if there have been any reports of bed bugs in any units.

2. Enter results of the inquiry in the “Comments” field under the “Property Information” tab as “no bed bugs reported” or “yes bed bugs reported”:

   a. **If no bed bugs reported**, proceed with inspection; or

   b. **If “yes” for bed bugs reported**, before proceeding with the inspection:

      i. Call the Technical Assistance Center (1-888-245-4860) to report the presence and location of the bed bugs and obtain a TAC number,

      ii. In the Comments field write the TAC number and identify the building(s) and units(s) with bed bugs.

      iii. If there is not sufficient space in the Comments field to write in all of the units, enter “Bed bugs yes, Building 1, 50 of 100 units” or if the property does not give the inspector the number of units input “Bed bugs yes, Building 1 numerous units – property did not provide number.”

C. Inspectors shall enter all units, reported to have bed bugs that show up in the sample and conduct the normal REAC inspection.

D. If the presence of bedbugs is discovered after the start of the inspection, the inspector must do all of the following:

   1. Call the TAC immediately;

   2. Report the presence of bed bugs and the location (building/unit);

   3. Obtain a TAC number and record the TAC number in the “Comments” field at under the “Property Information” tab;
4. Inspect the unit if it shows up in the sample.

E. If property representative refuses entry to units reported to have bed bugs, the inspector must do all of the following:

1. Call the TAC immediately; 1-888-245-4860
2. Obtain a TAC number and record the TAC number in the “Comments” field at under the “Property Information” tab;
3. Mark the inspection as unsuccessful.

Administration:

The presence and the treatment of bed bugs on a property will not be scored in the UPCS inspection.

Should you have any questions about this notice, please contact the REAC TAC at 1-888-245-4860 or at reac_tac@hud.gov