

## ESG Unit Inspection Requirements

### About this Tool

The standards for housing unit inspections under the Homelessness Prevention and Rapid Re-Housing Program (ESG) are the housing habitability standards, described in Appendix C of the ESG Notice. This resource is intended to provide grantees with a summary of HUD's policies related to habitability inspections.

### Which units need an inspection?

An on-site inspection is required anytime a program participant is receiving ESG financial assistance and moving into a new unit. (Financial assistance includes rental assistance, security deposit assistance, utility assistance, etc.) A housing unit inspection is *not* required for a program participant served with ESG prevention assistance in a unit in which the participant was already residing. Habitability inspections are also not required for persons receiving services only.

### Are habitability standards different from HUD's Housing Quality Standards?

Yes. The Housing Quality Standards (HQS) used for other HUD programs are more stringent than the habitability standards outlined in the ESG Notice. Grantees are not required to use HQS, but may do so if they choose.

### Does a certified inspector need to conduct inspections?

No. Unlike HQS inspections, which must be conducted by a certified inspector, habitability standards do *not* require a certified inspector to conduct on-site inspections. For example, units assisted by ESG may be inspected by:

- ESG program staff;
- Staff from or hired by an agency of the grantee's local government; or
- Staff from another subsidy program providing assistance to the unit and also requiring an inspection (e.g., Section 8, HOPWA TBRA), as long as they follow the minimum habitability standards required by ESG.

### When do inspections need to be conducted?

Inspections must be conducted upon initial occupancy and then on an annual basis for the term of ESG assistance.

### How do I conduct on-site inspections?

Use the *ESG Habitability Standards Checklist* (available on HUD's Homelessness Resource Exchange at <http://hudhre.info>) to guide you and/or other program staff conducting the on-site inspection. This checklist should be completed upon initial occupancy and on an annual basis for the term of ESG assistance. Copies of the completed checklists should be included in program participant files for documentation purposes.

**Can ESG funds be used to pay for habitability inspections?**

Yes, grantees may charge expenses associated with conducting habitability inspections under the Financial Assistance category.

**Are the habitability inspections the same as the Lead-Based Paint inspections?**

No. Under the Lead-Based Paint Poisoning Prevention Act of 1973, visual assessments for potential lead-based paint hazards must be conducted for all pre-1978 units in which a child under the age of six will be residing before financial assistance may be provided. Visual assessments must be conducted regardless of whether the program participant is receiving assistance to remain in an existing unit or moving to a new unit. Individuals can become a HUD-certified Visual Assessor by successfully completing the 20minute online training course on conducting visual assessments on HUD's website (available at: <http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>). Note that a HUD-certified Visual Assessor is not equivalent to a Certified Clearance Examiner, whose services may be needed if lead hazards are identified during the visual assessment.