

April 21, 2003

Nelson E. Stephens
PASS Program Manager
HUD Real Estate Assessment Center (REAC)
1280 Maryland Avenue, SW, Suite 800
Washington, DC 20024-2635

Norb Kowalczyk
U.S. Department of Housing & Urban Development
920 Second Avenue South, Suite 1300
Minneapolis MN 55402

Re: PHAS – PASS – Request for Database Adjustment – “Alarm strings tied up”
REAC Inspection Nos. 177028, 177044 - 177058
16 Hi-Rise buildings

Dear Mr. Stephens and Mr. Kowalczyk:

The Saint Paul Public Housing Agency (PHA) requests a database adjustment for its PHAS - PASS Physical Conditions score for this “deficiency”, which was cited at most of our sixteen of our hi-rise apartment buildings.

“Alarm string tied up” (0.2 points deducted for each occurrence)

“Call-for-Aid; Inoperable (NLT); Level 3; Location: bath/bedroom; Comments: string tied up.”

As the attached table show, our hi-rises were penalized a total of almost 15 points for 74 occurrences of this “deficiency”, with one score still not posted.

The cited condition did in fact exist in each instance, but we believe that correcting it is beyond the control of the PHA, and that the “deficiency” does not detract from the “acceptable basic living conditions” (statutory language) provided in the PHA’s housing. It also meets local code requirements.

Background: In the bathroom of each of our hi-rise units, and also in the bedroom in some units, there is a “nurse call alarm” switch which looks like an ordinary light switch. The switch is normally in the “up” position. If it is flipped to the “down” position for more than a few seconds, an alarm is sounded at an answering service and help is summoned to the apartment. A string attached to each switch hangs down to within a few inches of the floor. However, many residents loosely coil the string in loops around the switch rather than leaving it hanging down. Some do so because they have a cat which plays with the string and sets off the alarm, or small children visiting who pull the string, or simply because “it looks neater” coiled up. I am enclosing some photos which show the switch and string.

We did not realize that the coiled alarm strings were considered a UPCS deficiency until the inspector arrived this year and called it out in the very first unit he inspected. Staff quickly alerted the residents in the other buildings which would be inspected over the next month, with mixed results. Many residents probably got the message and let the string hang down at least as long as the inspector was in the building; others left it looped up. Really, all PHA staff can do is recommend that residents leave the string alone; we certainly cannot make it a requirement on the level of good housekeeping practices or avoiding fire hazards.

This condition (alarm strings looped up) is definitely permitted by our local codes. In fact, there is no code requirement that such alarms be installed, or that the switch and cord be in a particular position. In thousands of inspections conducted by our local health and safety inspectors, it has never been cited as a violation.

We believe citing these conditions as “Level 3” deficiencies creates results “which are unusual or incorrect due to facts and circumstances affecting the PHA’s property which are not reflected in the inspection or which are reflected inappropriately in the inspection.” 24 CFR Sec. 902.25(c)(2). This appears to be a situation which could be corrected directly by a database adjustment, without requiring a time-consuming reinspection of the property.

We request that this deduction be corrected by a database adjustment. If you have any questions about our request, please call Al Hester, Housing Policy Director, at 651-292-6173.

Sincerely,

Jon M. Gutzmann
Executive Director

JMG/FAH

Attachments: List of hi-rises and cited deficiencies, photos