

## Policy and Procedure for Self-Certification for UPCS Level 1 & Level 0 Findings

**Policy:** Owners of properties in satisfactory (and better) condition will be allowed to self-certify corrections for non-compliance cited in physical inspection reports when those findings are UPCS L1 and L0. To be eligible to self-certify, the property must meet the following:

- The property must be in Satisfactory condition on the current inspection report.
- The DCA Compliance Officer will review the inspector's report, pictures, previous inspections for noncompliance trends and then endorse the inspectors' Satisfactory rating.
- The Owner/Manager must have a history of cooperation and responsiveness.

**Background:** Level 0 noncompliance are items of concern cited by the Inspector which are not included in UPCS Dictionary, but may negatively impact marketability or lead to L1 conditions.

Examples include:

- Missing pine straw,
- Oil spots on the parking lot.

UPCS L1 violations are minor defects in the physical asset without threat to the Health and Safety of the residents. Select examples from the *UPCS REAC Dictionary of Definitions* include:

- (Site) Small hole in a fence (6"x6"), one instance of graffiti,
- (Building) Damage to soffit with no obvious way for water to enter building, mortar missing around one brick,
- (Common Area and Unit) Closet door does not function due to damaged hardware; missing door (except restroom, entry or fire door); damage to a window sill, but wall is not exposed and window functions; cracks or discoloration to sink;
- Missing sink stopper, but sink can be used; missing floor tile, more than 5% but less than 10% of the area, no safety hazard.

**Reasons to implement the policy:**

- This policy rewards owners who maintain their sites in satisfactory or better condition by reducing their reporting paperwork burden.
- It allows DCA Compliance Officers to focus on the correction of Health and Safety, L2 - L3 findings at the properties and on other properties in poor condition.

**Process:** The owner will be notified in the Findings Letter when a property is eligible for Self-Certification of physical deficiencies with a level 1 or without a level. A link to the Self-Certification document on the DCA website will be provided. The Self-Certification document will not be accepted without written evidence of eligibility from DCA.

**Procedure for Submitting All Cures:** For every finding, the owner should complete the “Owner Response” column with one of the following responses:

- Certified - if eligible for Owner Self-Certification, type the word “*Certified*” next to the appropriate L0 or L1 violation in the column labeled “*Owner Response*”.
- Cure Date - type the cure date next to the appropriate L2, L3 or Health and Safety violation in the column labeled “*Owner Response*” and submit the DCA Compliance Cover sheet with the corresponding backup (i.e. completed work order, invoice, job ticket, etc.). If the property is not eligible for the Self-Certification, the owner must insert the date of the cures for all physical deficiencies
- Disputed - type the word “*Disputed*” and then provide documentation from a qualified professional reflecting a reasonable opinion or case to dispute the inspector’s findings. The validity of this claim will be interpreted by DCA and ruled on accordingly.
- Open - this explains that the owner is aware of the deficiency but has not completed the correction. (This may result in 8823’s being submitted to the IRS).

**Example:**

<b><i>Building Review</i></b>		Date out of compliance	Owner Response
<b><u>BIN</u></b> <b><u>1</u></b>	<b><u>Roofs: - Gutter/Down spouts - Drainage system components are visibly missing or damaged with no visible damage to roof structure, exterior wall surface or interior. L2</u></b>	<b>1/13/2017</b>	<b>Open</b>
	<b><u>Physical Units</u></b>	Date out of compliance	Owner Response
<b><u>BIN</u></b> <b><u>1</u></b>	<b><u>Total Units (8)</u></b>		
	<b><u>Total Set-aside (8)</u></b>		
	<b><u>Living Room – Floors – Carpet/flooring has outlived its usefulness. L3</u></b>	<b>1/13/2017</b>	<b>2/1/2017</b>
	<b><u>Living Room – Floors – Object is a trip hazard/wires/electrical/cable cord, etc. H&amp;S</u></b>	<b>1/13/2017</b>	<b>1/14/17</b>
	<b><u>Kitchen Range – One burner is not working. L2</u></b>	<b>1/13/2017</b>	<b>1/16/17</b>
	<b><u>Additional Findings – Damaged lock on the back door. L2</u></b>	<b>1/13/2017</b>	<b>1/16/17</b>
	<b><u>Unit 607 Living Room- Carpet is badly wrinkled. H&amp;S</u></b>	<b>1/13/2017</b>	<b>1/20/2017</b>



The completed Findings Notice, evidence of the cures, and the Self-Certification must be returned by or prior to the date listed on the Findings Letter once all deficiencies have been corrected.

Each response must be submitted in the exact order as listed on the Findings Notice. It is acceptable to include multiple attachments under one DCA Compliance Cover Sheet provided all items are in the same location, (e.g., unit, building, etc.).

While management agents often supervise correction of defects and report the correction of noncompliance, the GP/Owner is ultimately responsible for completion of the corrections in a professional manner.

