

Exhibit G-2

Carbon Monoxide and Smoke Detection Devices

Guidance issued by the U.S. Department of Housing and Urban Development¹, “Public housing agencies and authorities (PHAs), and Owners of properties that receive federal rental assistance have an important role to prevent potential loss of life and severe injury associated with carbon monoxide (CO) in housing they own or manage. This notice reminds PHAs and Owners of CO poisoning risks in housing, identifies resources for preventing and detecting CO exposure, and provides notice of Section 101, “Carbon Monoxide Alarms or Detectors in Federally Insured Housing” of Title I of Division Q, Financial Services Provisions and Intellectual Property, of the Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, 134 Stat. 2162 (2020) (“the Act”), that requires CO alarms or detectors be installed in certain HUD-assisted housing within two years of enactment.”

HUD Regulation 24 CFR 882.404

Physical condition standards; physical inspection requirements.

(a) Compliance with physical condition standards. Housing in this program must be maintained and inspected in accordance with the requirements in 24 CFR part 5, subpart G.

PIH Notice 2022-01 and H Notice 2022-01

This notice clarifies that HUD will enforce the requirements instituted by Congress requiring that all Public Housing (PH), Housing Choice Voucher (HCV), Project Based Voucher (PBV), Project Based Rental Assistance (PBRA), Section 202 Supportive Housing for the Elderly (Section 202), and Section 811 Supportive Housing for Persons with Disabilities (Section 811) comply with the International Fire Code (IFC) 2018 standards on the installation of CO alarms or detectors by December 27, 2022.

PHAs and Owners are on notice that these requirements will be enforced by HUD after the effective date of December 27, 2022.

AHFC Policy

In its original Administrative Plan approved July 16, 2001 by HUD, AHFC and NeighborWorks Alaska agreed to inspect using Housing Quality Standards at 24 CFR 982.401.

¹ [PIH Notice 2022-01 and Housing Notice 2022-01](#) issued January 31, 2022; effective until amended, superseded, or rescinded. “Carbon Monoxide Alarms or Detectors in U.S. Housing and Urban Development (HUD)-Assisted Housing.”

1. Smoke Alarms

The term “smoke alarm” will be used throughout to mean single station smoke alarms and may include:

- Hard-wired devices with battery backup (may be interconnected with other smoke or CO detection devices that are UL approved as compatible)
- Hard-wired combination smoke and CO devices with battery backup (if this type of device is used, see Lifespan and Replacement of CO Detectors)
- Battery-operated devices

1.A Installation

HUD Regulation – 24 CFR 982.401(n) (Vouchers)

Smoke detectors performance requirement –

(1) Except as provided in paragraph (n)(2) of this section, each dwelling unit must have at least one battery-operated or hard-wired smoke detector, in proper operating condition, on each level of the dwelling unit, including basements but excepting crawl spaces and unfinished attics. Smoke detectors must be installed in accordance with and meet the requirements of the National Fire Protection Association Standard (NFPA) 74 (or its successor standards). If the dwelling unit is occupied by any hearing-impaired person, smoke detectors must have an alarm system, designed for hearing-impaired persons as specified in NFPA 74 (or successor standards).

(2) For units assisted prior to April 24, 1993, owners who installed battery-operated or hard-wired smoke detectors prior to April 24, 1993 in compliance with HUD’s smoke detector requirements, including the regulations published on July 30, 1992, (57 FR 33846), will not be required subsequently to comply with any additional requirements mandated by NFPA 74 (i.e., the owner would not be required to install a smoke detector in a basement not used for living purposes, nor would the owner be required to change the location of the smoke detectors that have already been installed on the other floors of the unit).

HUD Regulation – 24 CFR 982.605(b) (Voucher SRO)

SRO: Housing quality standards.

(4) Sprinkler system. A sprinkler system that protects all major spaces, hard-wired smoke detectors, and such other fire and safety improvements as State or local law may require must be installed in each building. The term “major spaces” means hallways, large common areas, and other areas specified in local fire, building, or safety codes.

PIH Notice 2022-01 and H Notice 2022-01

PHAs operating public housing units may use either Operating Funds or Capital Funds for purchase, installation, and maintenance of CO alarms or detectors.

Based on the Act’s set-asides, the Capital Fund Program conducts competitions

for additional funds for CO alarms or detectors. For the HCV and PBV programs, the property owner or landlord is responsible for the cost of CO alarms or detectors. PHAs may use their HCV administration funds for landlord outreach and education on these requirements. Owners of properties receiving assistance through the PBRA, Section 202, and/or Section 811 program may utilize the property's reserve for replacement account, residual receipts, general operating reserves, owner contributions, or secondary financing to fund the purchase, installation, and maintenance of CO alarms and detectors. These expenditures may be subject to a standard approval process where applicable, but the purchase, installation, and maintenance of CO alarms and detectors are deemed eligible expenses.

Alaska Statute 34.03.100

- (a) The landlord shall
(7) provide smoke detection devices and carbon monoxide detection devices as required under AS 18.70.095.

Alaska Statute 18.70.095

Smoke and Carbon Monoxide Detection Devices.

- (a) Smoke detection devices shall be installed and maintained in all dwelling units in the state, and carbon monoxide detection devices shall be installed and maintained in all qualifying dwelling units in the state. The smoke detection devices must be of a type and shall be installed in a manner approved by the state fire marshal. The carbon monoxide detection devices must have an alarm and shall be installed and maintained according to manufacturers' recommendations.

AHFC Policy

Smoke alarms are installed according to manufacturer's instructions.

1.B Maintenance, Lifespan, and Replacement

Alaska Statute 18.70.095

Smoke and Carbon Monoxide Detection Devices.

- (b) In a dwelling unit occupied under the terms of a rental agreement or under a month-to-month tenancy,
(1) at the time of each occupancy, the landlord shall provide smoke detection devices and, if the dwelling unit is a qualifying dwelling unit, carbon monoxide detection devices; the devices must be in working condition, and, after notification of any deficiencies by the tenant, the landlord shall be responsible for repair or replacement; and

(2) the tenant shall keep the devices in working condition by keeping charged batteries in battery-operated devices, if possible, by testing the devices periodically, if possible, and by refraining from permanently disabling the devices.

2. Carbon Monoxide Devices

- The term “CO alarm” mean: a single or multiple station alarm intended to detect carbon monoxide gas and alert occupants by a distinct audible signal. It incorporates a sensor, control components and an alarm notification appliance in a single unit.
- The term “CO detector” means a device with an integral sensor to detect carbon monoxide gas and transmit an alarm signal to a connected alarm control unit.

CO alarms are installed according to manufacturer’s instructions in all “qualifying dwelling units (see Definitions section).”

- Hard-wired devices with battery backup (may be interconnected with other smoke or CO detection devices that are UL approved as compatible)
- Hard-wired combination smoke/CO devices with battery backup (may be interconnected with other smoke or CO detection devices that are UL approved as compatible)
- Battery-operated devices requiring periodic replacement of batteries
- Devices powered by long-lasting batteries that are designed to last for the entire life of the device

3. Inspection and Testing

AHFC Policy

1. NeighborWorks Alaska (NWA) will be responsible for identifying, inspecting, and testing all carbon monoxide and smoke detector devices in a unit.
2. NWA will identify the location of detectors to all new residents during the move-in inspection.
3. AHFC will inspect and test carbon monoxide and smoke detection devices during its quality control inspections.

3.A Family's Responsibilities

During occupancy:

1. Test devices periodically (exception: building-wide and local unit panel monitored systems)
2. Keep all devices in working condition by keeping charged batteries in battery-operated or battery-backup devices at all times
3. Refrain from removing batteries or otherwise disabling, damaging, tampering, or interfering in any way with the proper functioning of any device
4. Immediately report any device malfunction to AHFC

3.B NWA's Responsibilities

1. Inspect and test all devices at the time of vacancy and replace batteries or devices to insure all are operational prior to re-occupancy
2. Test all devices during the move-in inspection and all subsequent HQS and housekeeping inspections
3. Immediately generate an emergency work order when a device is reported to not function properly or does not operate properly when tested
4. Contract for the inspection of building-wide and local unit, panel-monitored, building safety systems as required by state and local codes

4. Definitions

4.A Carbon Monoxide

CO is an odorless, colorless, and toxic gas. It is impossible to see, and is a tasteless gas produced by incomplete combustion of fuel burned in vehicles, small engines, stoves, lanterns, grills, fireplaces, gas ranges, or furnaces. It can build-up indoors and poison people and animals who breathe the toxic fumes. The effects of CO exposure can vary from person to person depending on age, overall health, and the concentration and length of exposure. Exposure can cause harmful health conditions, permanent brain damage, life-threatening cardiac complications, fetal death or miscarriage, and death in a matter of minutes. Individuals who are asleep or intoxicated may die from CO poisoning before experiencing any symptoms.

4.B Decent, Safe, Sanitary Housing

[PHAs and other entities] maintain such housing in a manner that meets the physical condition standards set forth in this section (24 CFR 5.703) in order to be considered decent, safe, sanitary and in good repair.

4.C Qualifying Dwelling Unit²

Qualifying dwelling unit means a dwelling unit that

- (A) contains or is serviced by a carbon-based-fueled appliance or device that produces by-products of combustion;
- (B) has an attached garage or carport; or
- (C) is adjacent to a parking space;

Numbered Memo

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² Alaska Statute 18.70.095 Smoke and Carbon Monoxide Detection Devices.