

# Carbon Monoxide Detection in HOPWA-Assisted Units Webinar Questions and Answers

Answers to questions about HUD's [Notice CPD-22-15 Carbon Monoxide Alarms or Detectors in Housing Opportunities for Persons With AIDS \(HOPWA\)-Assisted Housing](#).

These questions and answers are supplements to HUD's [Notice CPD-22-15 Carbon Monoxide Alarms or Detectors in Housing Opportunities for Persons With AIDS \(HOPWA\)-Assisted Housing](#) webinar. For more information on this topic, definitions for terms used below, resources, and screening tools, please visit the [HUD Exchange](#).

*Please note that the answers provided below apply to the HOPWA program only and are based upon Notice CPD-22-15 and Chapters 9 and 11 of the International Fire Code (IFC). Some states or municipalities have more restrictive laws regarding CO detection, and the answers provided below only address the federal standards. Neither the new statutory requirement nor this Notice preempts or limits the applicability of any State or local law that imposes more stringent standards relating to the installation and maintenance of CO alarms or detectors in housing. HOPWA grantees are encouraged to use legal resources to determine if more stringent requirements exist in their community and follow both this Notice and local requirements.*



## What is carbon monoxide detection?



As defined by Section 915.1 through 915.2.3 of the IFC, CO detection means that CO alarms complying with Section 915.4 or CO detection systems complying with Section 915.5 are in units when and where required.



## Is a carbon monoxide detector or alarm required for every HOPWA-assisted housing unit?



HOPWA grantees and project sponsors must ensure CO alarms or detectors are installed as required in all HOPWA-assisted units, when CO detection exemptions do not apply. This includes units assisted with acquisition, rehabilitation, conversion, lease, and repair of facilities to provide housing and services ([24 CFR 574.300\(b\)\(3\)](#)); new construction ([24 CFR 574.300\(b\)\(4\)](#)); project or tenant-based rental assistance ([24 CFR 574.300\(b\)\(5\)](#)); short-term rent, mortgage, and utility payments ([24 CFR 574.300\(b\)\(6\)](#)); permanent housing placement ([24 CFR 574.300\(b\)\(7\)](#)); and operating costs ([24 CFR 574.300\(b\)\(8\)](#)).

There may be HOPWA-assisted housing units that do not require a CO detector or alarm based on the applicable standards provided by [Chapter 9](#) and [Chapter 11](#) of the 2018 International Fire Code (IFC). However, there needs to be verification that all HOPWA-assisted housing units are meeting the CO detection requirements. If a unit is determined to not need a CO detection based on the new requirements, documentation of that determination will need to be added to the client file to demonstrate compliance with the CO detection requirements.

CO detection requirements do not apply to all situations where permanent housing placement (PHP) is utilized. Please refer to the [PHP Eligible Costs and CO Detection Requirements](#) document for additional information.

This HOPWA requirement applies to single-family or multiple-unit buildings, single-room occupancy (SRO) units, hotels and motels, master leased units, and all types of facility-based housing.

**Q**

**Does this new carbon monoxide detection requirement apply to HOPWA housing assistance provided before the 12/27/2022 effective date?**

**A**

No, the CO detection requirements in Notice CPD-22-15 do not apply to HOPWA housing assistance provided before 12/27/2022. HOPWA grantees need to make sure any unit receiving assistance after 12/27/2022 meets or will meet this requirement. All housing units currently assisted with HOPWA funds will be affected by this new statutory requirement - not just new households or units that enter the program after 12/27/2022. Section IV (page 3) of Notice CPD-22-15 walks through how this statute affects the various HOPWA-eligible activities.

Note on STRMU: If STRMU assistance is initiated on or after 12/27/2022 but the assistance covers housing costs or utility bills occurring before 12/27/2022, the CO detection requirements apply to the unit being assisted.

**Q**

**What if we are unable to comply with the new carbon monoxide requirement by the effective date of 12/27/2022?**

**A**

Grantees and project sponsors should make sure that any new unit assisted under the HOPWA activities listed earlier meets this requirement before assistance is provided; this includes all financial assistance for STRMU or PHP that occurs after 12/27/2022. For units assisted under tenant- or facility-based housing that were already receiving assistance in the program, grantees and project sponsors should be actively working towards compliance with the new CO requirements outlined in Notice CPD-22-15 and should not wait until the next annual inspection. HUD, HOPWA grantees, and project sponsors are responsible for ensuring compliance with the CO requirements through grantee monitoring.

**Q**

**Should we withhold rent payments from HOPWA-assisted units that are not in compliance with the carbon monoxide requirement after December 27, 2022?**

**A**

Grantees and project sponsors should not provide new assistance to any **new** unit under any HOPWA activity, including STRMU or PHP assistance, if the unit does not meet CO detection requirements; however, grantees should continue subsidizing existing tenant- and facility-based housing units while working towards compliance. No one assisted by HOPWA should experience homelessness while a program is executing its plan toward compliance with the new CO detection requirement.

**Q**

**Can HOPWA funds be used to purchase carbon monoxide alarms or detectors?**

**A**

HOPWA funds cannot be used to purchase CO alarms or detectors outside of a HOPWA-assisted unit or building that receives operating costs. The purchase, installation, and maintenance of CO alarms or detectors is eligible under the operating costs line item. Section IV of Notice CPD-22-15 provides additional information on the allowable billing of staff time associated with implementing the new CO detection requirement.

Grantees and project sponsors should review local and state codes covering CO detection requirements. There may be communities where the local or state code places the responsibility of meeting CO detection requirements on the landlord. Some communities may offer free CO alarms or detectors available for eligible persons. Grantees and project sponsors should identify local options for obtaining free or low-cost CO alarms or detectors such as by contacting 2-1-1 or local fire departments.

**Q**

**Can we request a waiver exception for the new carbon monoxide detection requirements?**

**A**

No, exceptions/waivers cannot be made to HOPWA statutory requirements unless specified in the statute. The statute does not specify that the CO detection requirements may be waived.

**Q**

### Are units exempt from carbon monoxide detection if they don't have a fuel-burning appliance?

**A**

As outlined in the Notice, HOPWA programs need to determine if a unit requires CO detection or not based on the 2018 International Fire Code (IFC) and/or state and local law. All conditions, including the presence of a fuel-burning appliance, must be considered when determining whether CO detection is required in a unit. Documentation showing all conditions for the unit were considered should be completed and kept in the client's file (even if the unit is exempt) to show compliance with the CO detection requirements.

**Q**

### Which units require carbon monoxide detection?

**A**

CO detection is required when any of the four conditions below exist unless an exception applies. **All HOPWA units (dwelling and sleeping units) must be screened for all four conditions to determine if CO detection is required.**

1. A unit contains a fuel-burning appliance or a fuel-burning fireplace.
2. A unit is served by fuel-burning, forced-air furnaces.  
**Exception:** CO detection shall not be required in dwelling units and sleeping units where a CO detector is provided in the first room or area served by each main duct leaving the furnace, and the CO alarm signals are automatically transmitted to an approved location.
3. A unit is located in a building that contains a fuel-burning appliance or fuel-burning fireplace, even if outside of the unit.

**Exception:**

- CO detection shall not be required in dwelling units and sleeping units without communicating openings between the fuel-burning appliance or fuel-burning fireplace and the dwelling unit and sleeping unit. Note: a communicating opening is a door, window, or any opening which allows air to be exchanged between a fuel-burning appliance or garage and a sleeping unit or dwelling unit.
  - CO detection shall not be required in dwelling units and sleeping units where a CO detector is provided in one of the following locations:
    1. In an approved location between the fuel-burning appliance or fuel-burning fireplace and the dwelling unit and sleeping unit
    2. On the ceiling of the room containing the fuel-burning appliance or fuel-burning fireplace.
4. A unit is located in a building with an attached, private garage.  
**Exception:**
    - CO detection shall not be required in dwelling units and sleeping units without communicating openings between the private garage and the dwelling unit and sleeping unit.
    - CO detection shall not be required in dwelling units and sleeping units located more than one story above or below a private garage.
    - CO detection shall not be required where the private garage connects to the building through an open-ended corridor.
    - Where a CO detector is provided in an approved location between openings to a private garage and dwelling and sleeping units.

**Q**

### How should HOPWA programs document compliance with carbon monoxide detection requirements?

**A**

HOPWA programs should add an addendum to their habitability/HQS forms and create a CO detection checklist for self-certification. Programs can use the same questions for their habitability/HQS form addendum and self-certification checklist. For an example of a CO detection checklist please refer to the [Sample CO Detection Requirements Checklist](#)

Q

### Where does carbon monoxide detection need to be located?

A

When CO detection is required, the location depends on the type of unit.

- For dwelling units, CO detection must be installed in dwelling units, outside each sleeping area, and in the immediate vicinity of the bedrooms.
- Where a fuel-burning appliance is located in a bedroom or its attached bathroom, CO detection must be installed within the bedroom.
- For sleeping units, CO detection must be installed in sleeping units.

**Exception:** CO detection must be allowed to be installed outside of and in the immediate vicinity of each separate sleeping area where the sleeping unit or its attached bedroom does not contain a fuel-burning appliance and is not served by a forced air furnace.

Q

### What is the difference between a dwelling and a sleeping unit?

A

A dwelling unit is a single unit providing complete, independent living facilities for one or more persons, including permanent provisions for living, sleeping, eating, cooking, and sanitation. A dwelling unit can be a single-family home, a unit in a multi-unit apartment building, or an efficiency unit (zero-bedroom).

A sleeping unit is a single unit that provides rooms or spaces for one or more persons, includes permanent provisions for sleeping, and can include provisions for living, eating, and either sanitation or kitchen facilities **but not both**. Such rooms and spaces that are also part of a dwelling unit are not sleeping units. A sleeping unit can be a single room occupancy (SRO) or hotel/motel room.

Q

### What are the IFC's requirements for carbon monoxide alarms?

A

There are four CO alarm requirements to be aware of:

1. CO alarms shall receive their primary power from the building wiring where such wiring is served from a commercial source, and when primary power is interrupted, shall receive power from a battery. Wiring shall be permanent and without a disconnecting switch other than that required for overcurrent protection.

**Exception:** Where installed in buildings without commercial power, battery-powered CO alarms shall be an acceptable alternative.

2. CO alarms shall be listed in accordance with UL 2034.
3. CO alarms shall only be installed in dwelling units and sleeping units. They shall not be installed in locations where the code requires CO detectors to be used.
4. Combination of CO/smoke alarms shall be an acceptable alternative to CO alarms. Combination CO/smoke alarms shall be listed in accordance with UL 2034 and UL 217.

Q

### What are the IFC's requirements for carbon monoxide detectors/detection systems?

A

There are 2 requirements for carbon Monoxide detectors/detection systems to be aware of:

1. Carbon Monoxide detection systems must comply with NFPA 720
2. Carbon Monoxide detectors must be listed in accordance with UL 2075

**Q****What is the difference between a carbon monoxide alarm and a carbon monoxide detector?****A**

A CO “alarm” is a self-contained, single or multiple-station alarm intended to detect CO gas and alert occupants by a distinct audible\* signal. It incorporates a sensor, control components, and an alarm notification appliance in a single unit. A CO alarm may be hard-wired, plugged into an electrical outlet, or battery-operated. A combination smoke/CO alarm is an acceptable alternative to a CO alarm.

A CO “detector” is a device with an integral sensor to detect CO gas and transmit an alarm signal to a connected alarm control unit. It is usually part of a larger, central detection and alarm system that is monitored by a central control unit and is most commonly seen in larger multi-unit occupancies.

\* NOTE: Alarms and detectors may also incorporate a visual signal in the form of a strobe light to alert Deaf or hard-of-hearing occupants to the presence of CO.

**Q****Who should self-certify or screen for the carbon monoxide detection requirements outlined in the Notice?****A**

HOPWA grantees and project sponsors are ultimately responsible for making sure that applicable units have been screened for, and meet, these requirements. Therefore, screening forms should not be sent to landlords and assisted households without any background information or assistance. Staff educated on the CO detection requirements outlined in the Notice should assist landlords and clients with completion of any self-certification forms. So, while a landlord or client can answer questions asked on a self-certification screening form, HOPWA staff should walk through and explain any questions and requirements.

**Q****Besides screening for carbon monoxide detection requirements, does the actual carbon monoxide detector or alarm need to work to provide assistance?****A**

Yes. As part of this requirement to avoid serious health issues related to CO, any unit that requires detection must have working detection. CO alarms and detectors that become inoperable or begin producing end-of-life signals should be replaced.

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**Additional Resources Regarding HOPWA Carbon Monoxide Alarms or Detectors Requirements**

Questions concerning the Notice may be directed to the Office of HIV/AIDS Housing’s email box at [HOPWA@hud.gov](mailto:HOPWA@hud.gov). HOPWA grantees and project sponsors can also submit a question to [HOPWA’s Ask-A-Question Desk](#). Materials from the January 4, 2023 Notice CPD-22-15: Carbon Monoxide Alarms or Detectors in HOPWA-Assisted Housing Webinar and additional resources will be published to the HUD Exchange via the [HOPWA landing page](#) and announced through the HOPWA listserv.

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