

MINNESOTA NAHRO AFFORDABLE HOUSING UPDATE – MAY 2021



National Association of Housing and Redevelopment Officials

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TODAY'S SPEAKER

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TODAY'S AGENDA

HUD Updates

Emergency Rental Assistance Program

Emergency Housing Vouchers

CARES Act Waivers

Remote Video Inspections

NSPIRE Basics

High Priority Protocol

NSPIRE Standards



HUD Updates



PUBLIC HOUSING SHORTFALL FUNDING

- \$25 million for PHAs that experience, or are at risk of, financial shortfalls included in FY 2021 Appropriations
 - Financial shortfall defined as having less than two months of operating expenses held in reserves
 - Priority for PHAs with 249 or fewer public housing units with shortfalls and have less than one-month of reserves
 - Will allocate to additional agencies after small agencies
 - MTW Agencies eligible to apply

PUBLIC HOUSING SHORTFALL FUNDING

- Applying: a list of agencies that meet the shortfall definition can be found on HUD's Operating Fund Shortfall Funding Website
- Eligible agencies should complete the Shortfall Funding Application found in Appendix A of Notice PIH-2021-12
- Applications should be submitted to 2021ShortfallFunding@hud.gov
- Applications are due **June 4, 2021**

MTW EXPANSION

Work Requirements

- At least 10 hours a week
- Combination of employment, education/training, or other activities
- Elderly and disabled must be excluded from the policy
- 5-year evaluation period

Landlord Incentives

- Choose at least of 2 of the following activities:
 - Payment standards – SAFRMs
 - Payment standards – FMRs
 - Vacancy Loss
 - Damage Claims
 - Other landlord incentives
 - Alternative inspection standards

Applications due August 8

FOSTERING STABLE HOUSING OPPORTUNITIES ACT

- The omnibus also includes the Fostering Stable Housing Opportunities (FSHO) Act
- This bill would allow PHAs to request a voucher from HUD for youths aging out of foster care without amending their administrative plan
- It would also extend the length of time that a voucher may be used by a youth if they're enrolled in a PHA's FSS program or an acceptable alternative
- PHAs can project-base up to 30% of these vouchers

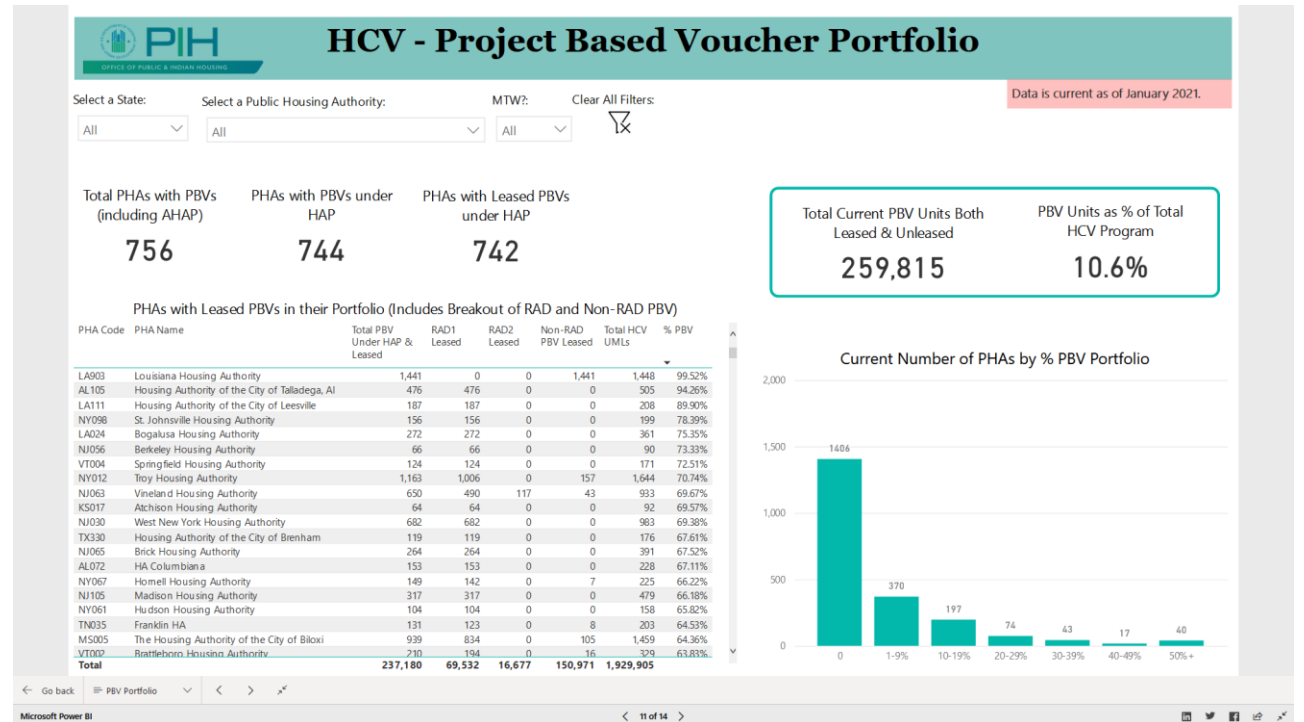
HOUSING STABILITY VOUCHERS

- The omnibus includes \$43 million for housing stability vouchers
- For people who are homeless, fleeing domestic violence, or veterans
- Will be for PHAs that have partnerships with Continuums of Care and based on geographical need
- The Department will give preference to applicants that demonstrate a strategy to coordinate assistance with services available in the community



HCV DASHBOARD UPDATED

- HUD Updates HCV Dashboard
 - Leasing Changes
 - More info on special purpose vouchers
 - Leasing potential
 - PBV portfolio
 - Individual PHA to PHA comparison





A FEW OTHER UPDATES


- Tenant Participation Funds Guidance Released
 - Notice PIH 2021-16
- FCC's Temporary Emergency Broadband Program
 - \$50 per month of broadband service
- HUD / HHS COVID-19 Partnership
 - Connecting community health centers and PHAs



HUD UPDATE Q AND A



Emergency Rental Assistance Program



ARP – EMERGENCY RENTAL ASSISTANCE

- **\$21.55 Billion** Distributed to State and Local Jurisdictions (at least 200,000 People) broken down as follows:
 - **\$18.712 billion** for state and local emergency rental assistance;
 - **\$305 million** for Puerto Rico, Virgin Islands, Guam, Northern Mariana Islands, and American Samoa;
 - **\$30 million** for program administration by the Treasury;
 - **\$3 million** for program oversight by the Inspector General; and
 - **\$2.5 billion** for high-need grantee payments.

EMERGENCY RENTAL ASSISTANCE – HIGH-NEED GRANTEES

- The high-need grantees funds are for state and local jurisdictions with very-low income (below 50% of Area Median Income (AMI)) renters that are paying more than 50 percent of their income on rent or living in substandard or overcrowded conditions since February 2020.

ARP – EMERGENCY RENTAL ASSISTANCE

■ **Eligible Households:**

- Households with at least one member that:
 - Is Obligated to Pay Rent on a Residential Dwelling;
 - Qualifies for Unemployment Benefits;
 - Reduction of Income Due to COVID-19 or Experiencing Homelessness; and
 - Low-Income Family (Below 80% of AMI).

ARP – EMERGENCY RENTAL ASSISTANCE – ELIGIBLE USES

■ **Direct Financial Assistance**

- Rent (3 months going forward),
- Rental arrears,
- Utilities and home energy costs,
- Utilities and home energy arrears, and
- Other expenses related to housing not to exceed 18 months.

ARP – EMERGENCY RENTAL ASSISTANCE – ELIGIBLE USES

■ **Housing Stability Services**

- Up to 10% of Grant Amount
- Case Management
- Other Services for Housing Stability

■ **Administrative Costs**

- Up to 15% of Grant Amount

■ **Payment:**

- Directly to Landlord or Utility Provider
- If Refused, Then to Household



EMERGENCY RENTAL ASSISTANCE Q AND A



Emergency Housing Vouchers



EMERGENCY HOUSING VOUCHERS

- The American Rescue Plan allocates **\$5 billion** that can be used for the following:
 - New emergency vouchers (70,000 vouchers)
 - Renewals of emergency vouchers
 - Administrative Fees
 - Adjustments to the calendar year 2021 section 8 renewal funding

EMERGENCY HOUSING VOUCHERS – ACCEPTANCE

- You should have received a notice with the number of EHV vouchers you were receiving
- Must reply to EHVawards@hud.gov by May 24, 2021 (14-day time period)
- You have 4 options
 - Decline, No Vouchers
 - Accept Full Allocation
 - Accept Full Allocation, plus more (indicate how many more additional vouchers)
 - Accept, a Lesser Amount (indicate the number of vouchers; can't be less than min.)
- Must sign document

EMERGENCY HOUSING VOUCHERS – PIH 2021-15

- PIH 2021-15 titled “Emergency Housing Vouchers – Operating Requirements”
 - Operating Requirements – Main body
 - Available COVID-19 Waivers – Attachment 1
 - Sample MOU with a Continuum of Care (CoC) – Attachment 2
 - Homeless Certification – Attachment 3
 - Sample Human Trafficking Certification – Attachment 4

EMERGENCY HOUSING VOUCHERS

Eligibility for these vouchers includes:

People who are **homeless**

People who are **at risk of homelessness**

People who are **fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or**

People who are **recently homeless and for whom providing rental assistance will prevent the family's homelessness or have a high-risk of housing instability.**

EMERGENCY HOUSING VOUCHERS – ALLOCATION

- The vouchers will be allocated according to a formula that takes into the account the following:
 - Comparative homelessness need;
 - At-risk of homelessness need;
 - Geographic diversity including rural areas;
 - PHA capacity; and
 - Minimum allocation (25 vouchers min. and 15 min. in some rural areas with high need)

EMERGENCY HOUSING VOUCHERS – ADMIN. FEES

- Types of administrative fees included:
 - Preliminary Fees - \$400 per EHV for start-up costs
 - Placement Fee / Expedited Issuance Reporting Fee
 - \$100 for each EHV that is initially leased on the effective date of the voucher, if the PHA reported the voucher issuance date within 14 days of the later of the voucher issuance date or when PIC-NG becomes operational
 - \$500 for each EHV that is leased in the first four months of the effective date of the voucher increment
 - \$250 for each EHV that is leased between 4 to 6 months

EMERGENCY HOUSING VOUCHERS – ADMIN. FEES

- Types of administrative fees included (cont.):
 - Ongoing admin. fees – fully funded!
 - Column A rate
 - HUD may prorate this in the future
 - For the first 3 months, HUD will advance an amount equal to how much you would receive if you had leased-up all of your EHV's
 - Admin. fees may be used for more than operating expenses, may also be used for services

EMERGENCY HOUSING VOUCHERS – ADMIN. FEES

- Types of administrative fees included:
 - Services Fee - \$3,500 per EHV
 - Eligible uses for these fees must be incorporated into a PHA's administrative plan
 - Funding returned (e.g., from a security deposit) must be used for services or administrative fee eligible uses

EMERGENCY HOUSING VOUCHERS – HAP FUNDING

- Initial funding allocation will expire on Dec. 31, 2022.
- HUD will provide renewal funding for EHV's on a calendar year basis beginning with CY 2023

EMERGENCY HOUSING VOUCHERS – HOUSING SEARCH ASSISTANCE

- Housing Search Assistance (required)
 - Helping families ID units
 - Providing transportation assistance
 - Conducting owner outreach
 - Assisting with completion of rental applications and PHA forms and
 - Helping expedite the EHV leasing process for the family

EMERGENCY HOUSING VOUCHERS – PRE-INSPECTIONS

- Pre-inspection of HQS Units - if an EHV family selects a unit that passed an HQS inspection within 45 days of the request for tenancy approval (RFTA) form, the unit may be approved
- The family must be free to select their unit and not forced to use the pre-screened unit.

EMERGENCY HOUSING VOUCHERS – INITIAL SEARCH AND LEASE TERMS

- Initial Search Term – HUD mandates that the initial search term be 120 days
- Initial Lease Term – the initial lease term may be less than 12 months regardless of whether the shorter term is the prevailing market practice

EMERGENCY HOUSING VOUCHERS – PORTABILITY

- **Portability** - the notice makes certain changes to the normal requirements for billing, family briefings, coordination on services in certain instances, and division of administrative and other fees.

EMERGENCY HOUSING VOUCHERS – ENHANCED PAYMENT STANDARDS

- Enhanced Payment Standards - the notice allows for more flexible payment standards. Payment standards may be set at
 - 90% to 120% of the Fair Market Rent (FMR) and
 - 90% to 120% of the Small Area FMR at the PHA's discretion.
- Payment standards for EHV's may not be lower than the payment standards for the normal voucher program

EMERGENCY HOUSING VOUCHERS – MTW

- Moving to Work (MTW) agencies receiving EHV are bound to the terms of the notice.
- The MTW agency may request approval from HUD to administer EHV in accordance with the HCV programmatic flexibilities approved under the PHA's annual plan (or other MTW plan providing flexibilities).
- HUD may approve these flexibilities if they're not in direct conflict with the provisions of the notice.

EMERGENCY HOUSING VOUCHERS – SUNSETTING

- These vouchers may not be turned over after Sept. 30, 2023

EMERGENCY HOUSING VOUCHERS – REVOKING AND REALLOCATION

- After a minimum of one year after the effective date of the funding increment, PHAs will be assessed
- Housing authorities that have leased at least 95% of EHV's will not have any of their EHV's recaptured
- HUD will refresh the allocation formula in redistributing vouchers so PHAs that achieved higher utilization since the initial distribution will potentially benefit by receiving some of the reallocated vouchers
- The notice provides additional information on how funds will be recaptured.

EMERGENCY HOUSING VOUCHERS – MISCELLANEOUS

- All funds must be spent on eligible activities by the end of the program or they will be recaptured.
- The effective end date of the program is unknown, but the final end date is known.
- HUD must allocate all funds by Sept. 30, 2030 and all funds must be used by Sept. 30, 2035.

EMERGENCY HOUSING VOUCHERS – HUD EHV WEBSITE

- Check out www.hud.gov/ehv
- HUD will be doing lots of webinars
- List of all PHAs receiving EHV's and their allocations
- Other information and news



CARES Act Waivers



CARES ACT WAIVERS

Notice PIH 2021-14

Restates all waivers and alternative requirements

Most waivers are effective until December 31, 2021

4 new waivers and alternative requirements

WAIVER REMINDERS

PHAs have discretion to use most waivers

Alternative requirements are minimum standards

PHAs must publicly post all adopted waivers

PHAs must notify residents and owners

WAIVER EXTENSIONS

Most waivers extended to December 31, 2021

PHAS & SEMAP scores carry over for FYEs on or before December 31, 2021

Capital Fund Grant obligation & expenditure end dates extended for 24 months for all grant end dates in LOCCS as of April 10, 2020

PHA Admin Plan or **ACOP** informal changes allowed until September 30, 2021, formal adoption by December 31, 2021

NEW WAIVER: PH AND HCV-8: ELIGIBILITY DETERMINATION: INCOME VERIFICATION – ENDS DECEMBER 31, 2021

Waives 3rd-party income verification for applications, alternative requirement of self-certification

Application must submit affidavit attesting to reported income, assets, expenses, and other factors effecting income eligibility determination

PHAs must review EIV Income Report and the IVT Reports to confirm/validate family-income within 60-days of PIC submission.

If PHA determines family is ineligible, PHA must take steps to terminate family from the program.

NEW WAIVER: PH AND HCV-9: ELIGIBILITY DETERMINATION: SSN & CITIZENSHIP VERIFICATION – ENDS DECEMBER 31, 2021

Waives requirement to obtain and verify social security number documentation and documentation evidencing eligible noncitizen status before admission

PHAs may accept self-certification of date of birth and disability status

Alternative requirement – families must provide required documents within 90 days of admission for continued assistance

If PHA determines family is ineligible, PHA must take steps to terminate family from the program.

NEW SUSPENSION: 12.E.: COMMUNITY SERVICE AND SELF-SUFFICIENCY REQUIREMENT (CSSR) SUSPENSION – MAY 4, 2021, THRU APRIL 30, 2022

Waives requirement that non-exempt adult resident of PH contribute 8 hours per month of community service and/or participate in an economic self-sufficiency program

At annual reexamination, report on Form HUD-50058 each individual's CSSR status as pending (code "3")

PHAs may not enter or enforce CSSR "work-out" agreements

This waiver is non-discretionary and applies to all PHAs operating a public housing program

This waiver supersedes PH-5 & is applicable regardless of whether a PHA previously adopted PH-5

NEW WAIVER: HCV-15: PROJECT-BASED VOUCHER (PBV) & ENHANCED VOUCHER (EV) PROVISIONS ON UNDER-OCCUPIED UNITS – ENDS DECEMBER 31, 2021

Waives requirement that a family may not initially occupy a PBV or RAD PBV unit that has more bedrooms than what families qualifies for, so that a homeless family on the waiting list may lease.

Waives statutory prohibition on providing a PBV-assisted unit of 2 or more bedrooms to a single person so that a homeless single person may rent

PHAs must have no families on waiting list, after outreach and marketing, that qualify for the PBV or RAD PBV unit

Family will become subject to regulation no later than the end of the lease term following the expiration of the waiver.

NEW WAIVER: HCV-15: PROJECT-BASED VOUCHER (PBV) & ENHANCED VOUCHER (EV) PROVISIONS ON UNDER-OCCUPIED UNITS – ENDS DECEMBER 31, 2021

Waiver also applies to families currently occupying an under-occupied PBV unit (or a RAD PBV unit that the family leased after conversion), including a single person who is occupying a unit with 2 or more bedrooms – family may remain in the unit

Family will become subject to regulation no later than the end of the lease term following the expiration of the waiver.

NEW WAIVER: HCV-15: PROJECT-BASED VOUCHER (PBV) & ENHANCED VOUCHER (EV) PROVISIONS ON UNDER-OCCUPIED UNITS – ENDS DECEMBER 31, 2021

Also waives sub-regulatory guidance that requires family residing in an under-occupied unit at the time of RAD conversion, or a family that uses an Enhanced Voucher (EV) to remain in its under-occupied unit, to move from the unit when an appropriately-sized unit becomes available in the project

PHAs may allow such family to remain in the under-occupied unit until the end of the lease term following the expiration of the waiver, at which time the family will become subject to the relevant notice and must move to an appropriately-sized unit in the project when one becomes available.

PHAS – PIH NOTICE 2021-14

Extension of the CARES Act Waiver: HUD will carry forward most recent PHAS score on record for any PHA with a fiscal year end on or before December 31, 2021

New & Pending Scores: HUD will not issue a new PHAS score for any PHA with a fiscal year end on or before December 31, 2021, unless the PHA request a new PHAS score

Enforcement: HUD will continue using all information available to identify and address critical deficiencies that may have a negative impact on resident health and safety and other programmatic deficiencies not reflected in the most recent PHAS score

SEMAP – PIH NOTICE 2021-14

Extension of the CARES Act Waiver: HUD will carry forward Section Eight Management Assessment Program (SEMAP) scores on record for all PHAs with a fiscal year end on or before December 31, 2021

SEMAP Submissions: Waives requirement for PHAs to submit an annual SEMAP certification in IMS-PIC with 60 days of fiscal year end

New & Pending Scores: HUD will not issue a new SEMAP score for any PHA with a fiscal year end on or before December 31, 2021, unless the PHA request a new SEMAP score

Enforcement: HUD will continue using all information available to identify and address critical deficiencies that may have a negative impact on resident health and safety – HUD field offices may continue to perform SEMAP Confirmatory REVIEWS remotely through December 31, 2021

HQS INSPECTION EXTENSIONS – PIH NOTICE 2021-14

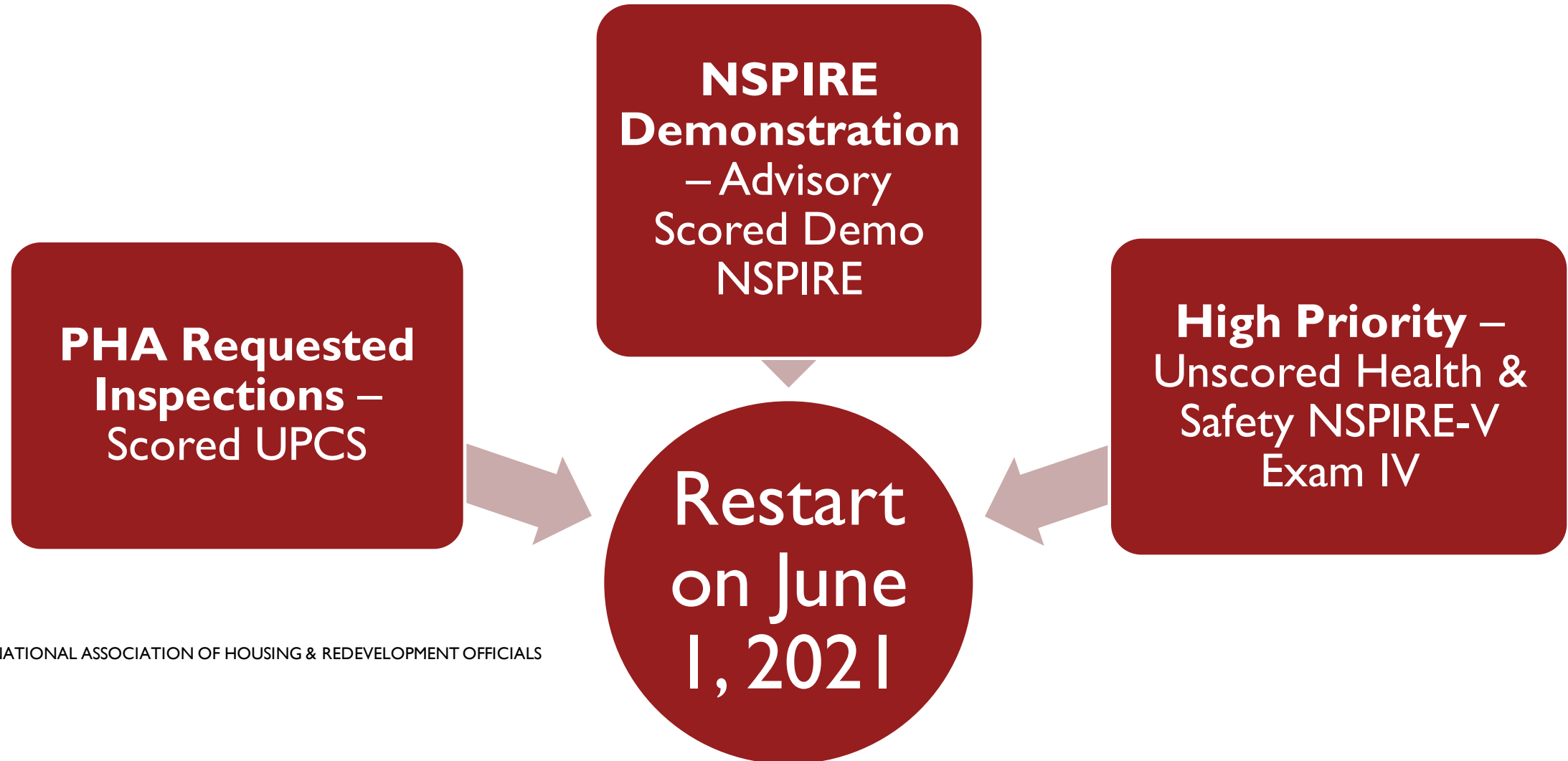
■ **Initial HQS Inspections:**

- Rely on owner certification to delay initial/biennial inspection extended to December 31, 2021
- All delayed initial inspections must be completed as soon as reasonably possible but no later than June 30, 2022

■ **Biennial HQS Inspections:**

- All delayed biennial inspections must be completed as soon as reasonably possible but not later than:
 - June 30, 2022 for all CY 2020 delayed inspections
 - December 31, 2022 for all CY 2021 delayed inspections
- This update extends the timeframe for the PHAs to complete the delayed biennial inspections to a more reasonable timeframe given the backlog of inspections. It also specifically prioritizes the units that have gone the longest without an inspection.

PUBLIC HOUSING INSPECTIONS





Remote Video Inspections



HOUSING CHOICE VOUCHER INSPECTIONS

- Housing Quality Standards (HQS)
- Uniform Physical Condition Standard for Vouchers (UPCS-V)
- NSPIRE-V

COVID-19 RELATED NEWS – INSPECTIONS

- For **Housing Quality Standards (HQS)** waivers, where the PHA has accepted an owner's certification, an inspection must be conducted within 1 year of the owner certification
- Additionally, **Remote Video Inspections (RVIs)** count as regular HQS inspections
 - They're regular HQS inspections performed with a proxy inspector
 - Benefits include
 - Safety during COVID COVID-19 times
 - Quick turnaround
 - Less driving
 - Help with backlog of inspections

WHAT IS RVI?

- RVI is a way to use technology to complete an HQS inspection without the inspector being on on-site.
- It helps PHAs overcome inspection challenges now, in a time of global pandemic, and in the future.
- As we learn together, HUD will share additional guidance and best practices.
- PIH is working with key stakeholders and continues to look for volunteers for RVI best practices and for testing for other programs, like public housing. Email HUD at RVI@HUD.gov to volunteer.

RVI SAFETY

- HUD is committed to prioritizing resident health & safety and streamlining the inspection process with RVI.
- HUD encourages PHAs to always prioritize safety of residents, including during the COVID-19 pandemic.
- PHAs should follow CDC and local social distancing recommendations and minimize risk to residents, inspectors and the proxies doing RVI inspections.

Remote Video Inspection (RVI) Demonstration



FOUR RVI STAGES

1. Administrative preparation
2. Pre-inspection planning
3. Performance of the inspection
4. Post inspection

I. RVI ADMIN PREPERATION

- Evaluate whether incorporating technology into the inspection process requires an update of the HCV Administrative Plan to provide stakeholders fair notice of the purpose and benefits of utilizing RVIs for HQS inspections.

2. RVI PRE-INSPECTION PLANNING

- **Assess Equipment Needs.** Consider whether the party performing the RVI has the equipment, and if not, how it is to be provided.
- PHAs are reminded of the waiver authority provided by PIH Notice 2020-33

3. THE INSPECTION

- Adhere to all CDC, local and state safety requirements.
- Choose a proxy for the inspection.
- Once inspection is scheduled HQS inspector uses PHA's streaming platform to contact proxy.
- The HQS inspector uses the same inspection form/device the PHA currently uses to record any deficiencies.

4. POST-INSPECTION

- **Inspection passes.** PHAs follow their Administrative Plan/procedure, inform the tenant/landlord, and follow the process to (1) process HAP for initial inspection or (2) approves inspection within their system.
- **Inspection fails.** PHAs follow their Administrative Plan/procedure, inform tenant/landlord of fail items, including any follow follow-ups such as a reinspection/verification or requirement for Lead Lead-Based Paint (LBP) clearance testing.

RVI TIPS

- **Personal Privacy**
 - No recording
- **Prevent “switching units”**
 - Any break in call require reverification
- **Eliminate subjective items:** hot water, electric outlets, fan function, refrigerator function
 - Developed \$20 tool bag that can be dropped off or picked up
- **Length of time per inspection**
 - Practice and repetition

TOOLS FOR SUCCESS

For Inspector

- Laptop with large screen or Large Monitor
- Practice prior to going live
- Clear script/directions to use while directing remote video operator
- Systematic approach to each room and unit

For Unit

- Decent Wi-Fi or Cell Connection of at least 2 bars
- Easy to use tools to visually demonstrate subjective items
- A stick for testing smoke and CO2 detectors (or provide folding yard stick)
- Clear and easy to follow directions from inspector

PIH 2020-3 | SUMMARY

- The RVI notice is published on RVI inspections and PHAs can use technology to virtualize the inspection process.
- The proxy follows the direction of the HQS inspector throughout the entire inspection process.
- The proxy is not performing the inspection, the inspector is.

PIH 2020-3 | SUMMARY

- The HQS inspection using RVI is a live streaming event, taking picture is not sufficient.
- Use standard HQS procedures for scheduling the inspection.
- HUD recommends the tenant, or the landlord or property manager attend the RVI inspection.
- This a great tool for the future of HCV inspections.



REMOTE VIDEO INSPECTION (RVI) Q AND A



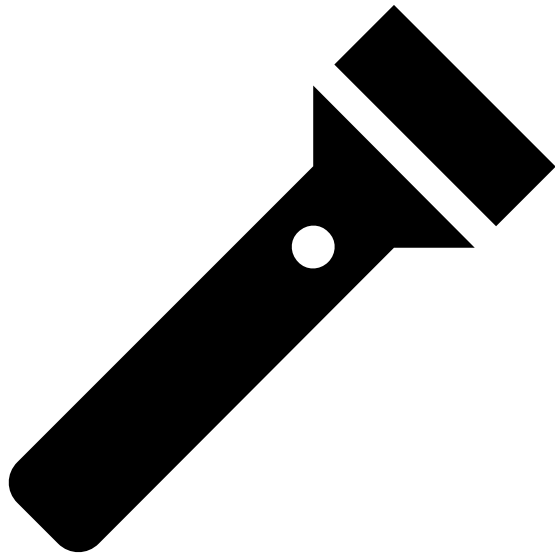
NSPIRE Basics



NSPIRE – WHAT DOES THAT MEAN!?!

National Standards for the Physical Inspection of Real Estate

HUD'S RATIONAL FOR CHANGING UPCS



While a significant majority of HUD and HUD-assisted properties are safe and in a quality condition, a new inspection model is needed to expediently address properties that are not. Issues include:

- Inspections do not always identify the extent of health and safety conditions affecting residents
- Properties can pass inspection even with poor unit conditions
- Scoring model no longer aligns with expectations about housing quality
- Some owners preparing for inspections, rather than performing maintenance year-round
- Deficiencies are not all Critical to Quality (CTQ)

INSPECTION TASK FORCE

Conduct

Conduct a wholesale reexamination of REAC inspections

Place

Place the greatest emphasis on eliminating health and safety hazards

Ensure

Ensure owners adopt sound maintenance practices year-round

TWO TRACK APPROACH

Track 1 – Immediate Changes to the Current System

14 Day Notice

Replacing the Reverse
Auction Program

Carbon Monoxide
Detectors

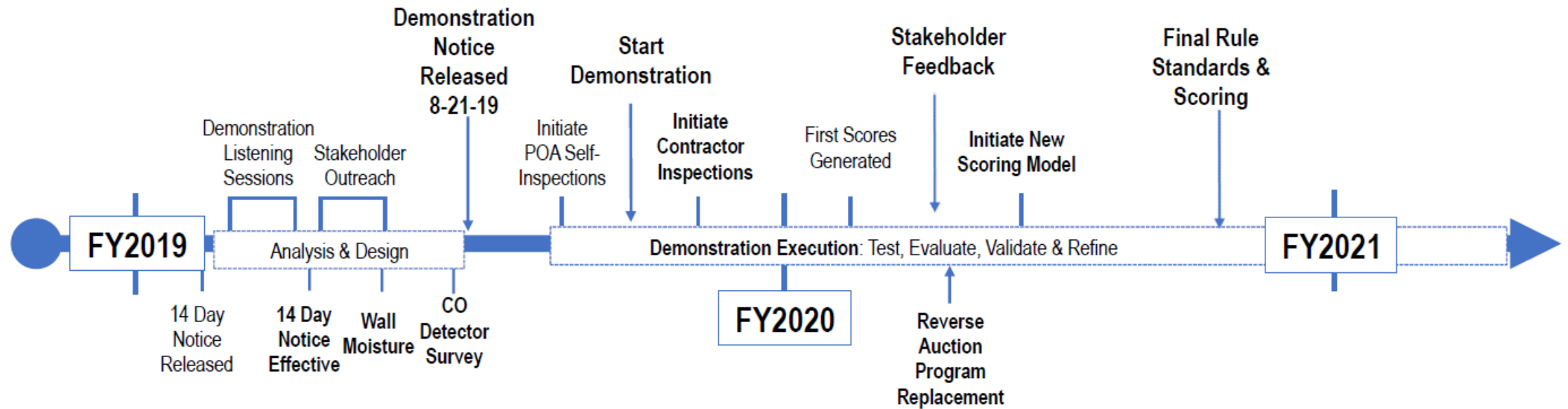
Measuring Wall
Moisture



Track 2 – Complete Review and Overhaul of the Inspection Process

INSPECTION IMPROVEMENTS TIMELINE

Track 2: NSPIRE Standards, Protocols, and Processes



Track 1: Changes To Current Process

REPLACING THE REVERSE AUCTION PROGRAM CONTRACT

- **HUD is replacing the Reverse Auction Contract method in two steps:**
 1. Demonstration
 2. All Inspections

MEASURING WALL MOISTURE

- Federal Inspectors are using infrared cameras and moisture meters to test wall moisture at a limited number of properties.
- HUD is asking for specific feedback on the methods used to measure wall moisture.

DESIRED OUTCOME OF NEW INSPECTION MODEL

Protect families and Reflect the true physical condition

- Convey HUD's property management expectations to owners - failing scores remain unacceptable
- Strengthen current standards, scoring models, and protocols used to assess properties
- Implement stricter enforcement protocols against owners who are not meeting standards

GOALS OF THE INSPECTION

- Ensure families are living in decent and safe housing
- Enhance accuracy through:
 - Better identification of substandard properties
 - Increased objectivity and defensibility of inspections
 - Streamlined inspection processes
- Evaluate the National Standards for the Physical Inspection of Real Estate (NSPIRE) model

NSPIRE MODEL – CONCEPTUAL VIEW

3 Types of Inspections – Confidence Increased

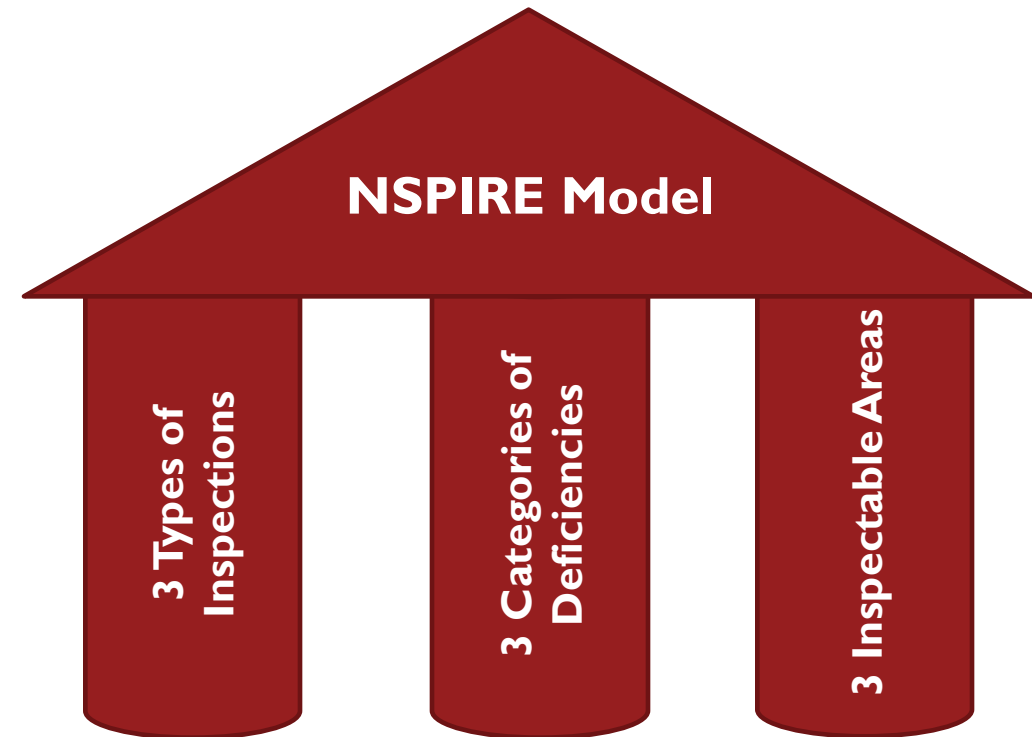
- Property Owner/Agent (POA) Self-Inspections
- REAC Contracted Inspections
- HUD Quality Assurance Inspections

3 Categories of Deficiencies – Resident Focused

- Safety and Health
- Function and Operability
- Condition and Appearance

3 Inspectable Areas – Complexity Reduced

- Unit
- Inside
- Outside



Underpinned by 3 mutually supporting components

WHAT IS A CTQ?

Critical to Quality (CTQ) Assessment Standards

- Well-defined subset of the entire set of the NSPIRE Standards
- Allows inspectors to evaluate fewer standards than the self-inspection but remain effective in determining substandard conditions
- Will be developed later in the demonstration

Exigent Health & Safety (EH&S) Items

- Items that must be corrected, remedied, or abated within 24 hours of receipt of notification of deficiencies
- Will be published before demonstration begins
 - Should be similar to EH&S items in UPCS

NEW MODEL: 3 TYPES OF INSPECTIONS

Reasonable assurance
into property's
condition

POA Self-Inspections

Who: Property Owners/Management

What: All deficiencies reported to HUD

When: Once a year

Where: All units

Why: To gain a reasonable level of confidence in results &
To ensure work orders are being generated



REAC Contracted Inspections

Who: Contract Inspectors

What: CTQs

When: Periodic inspections (3, 2, 1 years)

Where: High sample rate

Why: To gain a high level of confidence in results

Evidentiary support to
enforcement and/or
sanctions

HUD Quality Assurance Inspections

Who: HUD Federal Inspectors

What: CTQs++

When: Triggered by poor conditions

Where: Highest sample rate

Why: To gain the highest level of confidence in results



*CTQs = Critical to Quality Indicators; Inspection standards that have a high correlation to quality

THREE TYPES OF DEFICIENCIES

Precision

CTQs Per Category

Response Level

Objective

Safety & Health

Urgent: Emergency Work Order

**Function &
Operability**

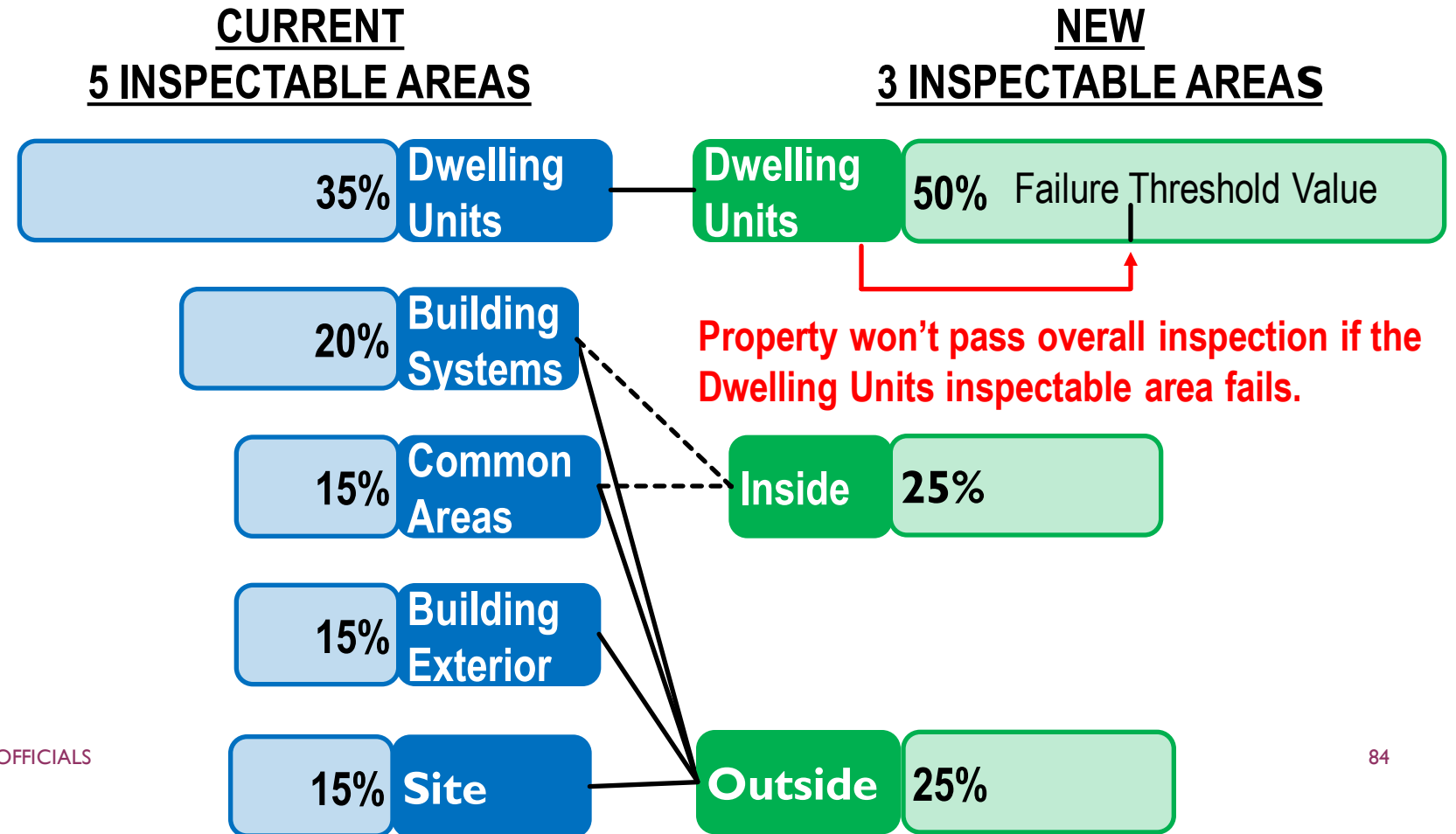
Planned: Routine Work Order

Subjective

**Condition &
Appearance**

THREE INSPECTABLE AREAS

- 5 Inspectable areas will feed into the 3 new inspectable areas
- Simplified, intuitive approach based on the inspectable item's physical location





NSPIRE BASICS Q AND A



High Priority Protocol



2020-2021 INSPECTION TIMELINE

- March 15, 2020 – HUD REAC inspections suspended
- August 10, 2020 – REAC Memo on Return to Operation (RTO)
- October 5, 2020 – HUD REAC inspections restarted
- April 23, 2021 – Sec. Fudge letter increasing inspections June 1, 2021
- April 28, 2021 – REAC Memo to owners updating RTO guidelines
- June 1, 2021 – December 31, 2021 – Inspection Period

WHICH PROPERTIES ARE GETTING INSPECTED

- Multifamily – High Priority
- Multifamily – NSPIRE Demonstration Properties
- Public Housing – High Priority
- Public Housing – Inspection Requested for PHAS Purposes
- Public Housing – NSPIRE Demonstration Properties

EXTENDED NOTICE

- 28-day notice – extended from 14-day notice
- HUD will evaluate local public health conditions throughout the notice period prior to arriving on-site
- Notices began on Tuesday, May 4, 2021, for June 1, 2021, inspections

COVID SAFETY PROTOCOLS

- Inspector Notice 2021-1 – April 27, 2021
- REAC Inspectors will follow CDC recommended guidance for travel, social distancing, the use of hand-sanitizer and the wearing of appropriate personal protective equipment (PPE) (e.g., wearing face masks and gloves) throughout an inspection.
- Residents may refuse inspection – Inspector will select alternative.
- Resident Flyer

COVID SAFETY PROTOCOLS – TRAVEL

Domestic Travel Recommendations & Requirements	Not Vaccinated	Vaccinated
Get tested 1-3 days before travel	X	
Get tested 3-5 days after travel and self-quarantine for 7 days. Self-quarantine for 10 days if not tested.	X	
Self-monitor for symptoms	X	X
Wear a mask and take other precautions during travel	X	X

INSPECTION STANDARDS

- HUD will use both UPCS and NSPIRE
 - Multifamily – High Priority – UPCS
 - Multifamily – NSPIRE Demonstration Properties – NSPIRE
 - Public Housing – High Priority – NSPIRE – NSPIRE-V Exam IV
 - Public Housing – Inspection Requested for PHAS Purposes – UPCS
 - Public Housing – NSPIRE Demonstration Properties – NSPIRE



HIGH PRIORITY PROTOCOL Q AND A



NSPIRE Standards



NSPIRE STANDARDS

HUD has released their second set of NSPIRE standards



HUD requests comments from interested individuals on each of the standards, including:

How inspections are
conducted

What inspectors should
look for

And what should count as a
deficiency

NSPIRE STANDARDS

- HUD currently has 63 standards listed on their website
 - https://www.hud.gov/program_offices/public_indian_housing/react/nspire/standards
- Examples include:
 - Address and signage
 - Bath ventilation
 - Carbon monoxide
 - Cooking range
 - Doors
 - Egress
 - Dryer Vent
 - Electrical enclosures
 - Elevators
 - Exposed wire
 - Fence general
 - Fence security
 - Fire extinguisher
 - Floor coverings
 - HVAC
 - Leaks
 - Light fixtures
 - Mold
 - Parking lot
 - Roads and driveways
 - Sidewalks
 - Site drainage
 - Windows

CARBON MONOXIDE ALARM

- **Definition:** Device that detects elevated levels of carbon monoxide and signals via auditory or visual alarm in order to prevent carbon monoxide poisoning.
- **Purpose:** Detect and signal elevated carbon monoxide levels to prevent poisoning.
- **More Information:** This is not a replacement for a code inspection. All requirements of IFC Sections 915 and 1103 must be met, even though only the criteria listed herein will be inspected for in a NSPIRE inspection. Local or state code will take precedence over HUD requirements if that code is more protective than the HUD requirements, with documentation and approval.

CARBON MONOXIDE ALARM DEFICIENCIES

- **Deficiency 1:** Carbon monoxide detector is missing, not installed, or not installed in a proper location. (Unit, Inside)
- **Deficiency 2:** Carbon monoxide detector is obstructed. (Unit, Inside)
- **Deficiency 3:** Carbon monoxide detector does not produce audio or visual alarm when tested. (Unit, Inside)

DEFICIENCY 1: CARBON MONOXIDE DETECTOR IS MISSING, NOT INSTALLED, OR NOT INSTALLED IN A PROPER LOCATION (UNIT)

■ **Criteria:**

- Carbon monoxide detector is missing (i.e., evidence of prior installation, but is now not present or is incomplete).
OR
- Carbon monoxide alarm is not present in each Unit that contains or is served by a fuel-burning appliance or a fuel-burning fireplace. OR
- Carbon monoxide alarm is not present in each sleeping area (e.g., bedroom) that contains a fuel-burning appliance or a fuel-burning fireplace. OR
- Carbon monoxide alarm is not in the immediate vicinity of the bedroom(s), if a Unit contains or is served by a fuel-burning appliance or fuel-burning fireplace, and the bedroom is not served by a fuel-burning appliance or fuel-burning fireplace. OR
- Carbon monoxide alarm is not present in each Unit, including in the immediate vicinity of the bedroom(s), for Units with communicating openings between a private garage and the Unit and bedroom(s). OR
- Carbon monoxide alarm is not present within a bedroom where a fuel-burning appliance is located within that bedroom's attached bathroom.

- **Health and Safety Determination:** Life-Threatening. **Correction Timeframe:** 24 hours

DEFICIENCY 1: CARBON MONOXIDE DETECTOR IS MISSING, NOT INSTALLED, OR NOT INSTALLED IN A PROPER LOCATION (UNIT)

- **Observation:**

- Check for the presence of a carbon monoxide detector on walls or ceilings.

- **Request for Help:**

- Ask the POA to identify the location of any fuel-fired or combustible appliance in, or if the garage shares communicating opening(s) with, the unit or sleeping area.

- **Action:**

- Confirm the carbon monoxide detector is present where required

DEFICIENCY 2: CARBON MONOXIDE DETECTOR IS OBSTRUCTED. (UNIT)

- **Criteria:**

- Carbon monoxide detector is obstructed

- **Action:**

- Determine if the carbon monoxide detector is covered by a foreign object (e.g., plastic bag, shower cap, zip tie, paint, tape).

- **More Information:**

- A combination smoke and CO alarm should be evaluated under both the Carbon Monoxide Detector and Smoke Alarm standards.

- **Health and Safety Determination:** Life-Threatening. **Correction Timeframe:** 24 hours

DEFICIENCY 3: CARBON MONOXIDE DETECTOR DOES NOT PRODUCE AUDIO OR VISUAL ALARM WHEN TESTED. (UNIT)

- **Criteria:**

- Carbon monoxide detector does not produce an audio or visual alarm when tested.

- **Action:**

- If the test button is less than 8 feet high, press the test button. (POA if over 8 feet high)

- **More Information:**

- If the batteries are dead, then the CO detector should be evaluated under this deficiency.
- Any CO detector that is present should be evaluated under this deficiency.

- **Health and Safety Determination:** Life-Threatening. **Correction Timeframe:** 24 hours



Questions!



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