

National Standards for the Physical Inspection of Real Estate (**NSPIRE**) for **Voucher Programs**

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MN NAHRO September 16, 2024

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NSPIRE for Vouchers: Policy





Introduction to NSPIRE



- National Standards for the Physical Inspection of Real Estate (NSPIRE)
 - Final Rule May 11, 2023
 - Final (current) Standards June 22, 2023
- Replaces Uniform Physical Conditions Standards (UPCS) for Public Housing
- Redefines Housing Quality Standards (HQS) for Housing Choice Voucher (HCV) programs
- Updates HUD's 20+ year old physical inspection models
- Prioritizes health, safety, and functional and structural defects
- Puts the focus on the areas that impact residents the most
- Better aligns inspection standards across HUD Housing

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Administrative Notices for Voucher Programs



- On July 5, 2024, HUD gave PHAs the option to extend compliance for Voucher programs for another year until October 1, 2025, through Federal Register Notice (89 FR 55645).
 - HUD first gave PHAs the option to extend NSPIRE compliance for Voucher programs until October 1, 2024, on September 28, 2023 (88 FR 66882).
- Notice PIH 2024-26 (REVISION to Notice 2023-28) posted August 9, 2024, and included:
 - Details about the new extension of compliance date to October 1, 2025.
 - · Updates to the requirements to notify HUD.
 - · Reminders to PHAs that certain standards must still be met due to statutes/congressional mandates.
- Notice PIH 2023-28 was issued on September 29, 2023, which implemented NSPIRE for HCV programs, including the Project-Based Voucher (PBV) program, and the Section 8 Moderate Rehabilitation (Mod Rehab) program, included details about the initial extension, and additional administrative procedures for NPSIRE implementation.



Compliance Date

NSPIRE

- Previous Compliance Date: October 1, 2024
- New Compliance Date: October 1, 2025
- If you have already implemented NSPIRE into your HQS inspections and notified HUD, there is nothing further you need to do at this time
- If you were delaying until October 1, 2024 and will now delay until October 1, 2025, there is nothing further you need to do at this time.
- If you were planning to implement earlier than October 1, 2024, but did not, you need to inform HUD of your changes.
- If you plan to implement NSPIRE anytime before the new compliance date, you will need to notify HUD (instructions included in 2024-26).



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Notification of Implementation of NSPIRE for Vouchers

- NSPIRE
- With the new extension, PHAs are now only required to notify HUD if they will implement NSPIRE for Voucher programs before October 1, 2025 or if their original plans change(d).
- If PHA has already implemented NSPIRE for Voucher programs and informed HUD and received confirmation, they do not need to inform us again.
- If a PHA plans to implement NSPIRE any date prior to October 1, 2025, or if the original planned date changed, they must notify HUD by emailing <u>NSPIREV_AlternateInspection@hud.gov</u> (cc to their Field Office) with the following:
 - PHA Name
 - · PHA Code
 - The date they plan to implement NSPIRE (and keep us posted if it changes).
- The full list of instructions can be found in Notice PIH 2024-26.

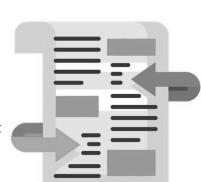


NSPIRE Final Rule

NSP RE

WZ

- Established NSPIRE as the unified inspection protocol for HUD Housing
 - HUD Housing = All Public Housing Programs, Multi-Family and Mortgage Programs, CPD Programs, and Voucher Programs
 - · Final Rule covers all these programs
- HUD will update NSPIRE Standards every three years through Federal Register notice allowing opportunity for public comment
- "Affirmatives" now in regulation for all HUD Housing (previously "acceptability criteria" for HCV)
- New nomenclature for health and safety deficiencies:
 - Life-threatening, Severe, Moderate, Low
- Aligns all HUD Housing with HOTMA's Life-Threatening List



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Unchanged for Voucher Programs



- Types of inspections (initial, periodic, special, turnover for PBV)
- Timing of inspections (biennial, triennial, sampling for PBV)
- Who conducts inspections (PHAs, Contractors, Independent Entity)
- Allowance for HUD-approved Variations (for local codes/conditions)
- Alternative Inspection Methods (inspections for other types of housing assistance)
- Special Housing Types (24 CFR Part 982 Subpart M)
 - Special requirements still exist
- Enforcement of Housing Assistance Payments (HAP) Contract
- Enforcement of Family Obligations

RLO Maybe remove this since it is relevant to NSPIRE for HCV.

Rawson, Laure, 2024-08-02T20:22:28.019

KMO 0 I was just keeping it in for FYI so they know that NSPIRE final rule covers all the programs but we can discuss everyone's preference?

Kitchen, Dana M, 2024-09-11T15:58:51.327

WZ1 [@Kitchen, Dana M] Note from the discussion this morning: Using this bullet to explain that not information they read will be relevant White, William Z, 2024-09-11T16:41:49.676

Slide 8

LRO Although NSPIRE didn't change these items, in some cases, HOTMA did. This is an area where OPHVP could potentially create some additional slides to go a little more in-depth.

Rawson, Laure, 2024-08-15T13:58:34.540

KM0 0 Agreed. :)

Kitchen, Dana M, 2024-09-11T15:59:05.936

WZ1 Could this be a seperate OHs , we are still missing a few topic areas, this could satisfy that

White, William Z, 2024-09-11T16:44:22.898

WZ1 0 Great opp for OHs and Webinars plug " OHs to come, get ready for......"

White, William Z, 2024-09-11T16:45:32.228

WZ1 1 "How does HOTMA impact you?"

White, William Z, 2024-09-11T16:46:28.588

WZ1 2 Possible opp for TA money HOTMA build-out?

White, William Z, 2024-09-11T16:47:21.699



Changes for Voucher Programs N



- NSPIRE changes the standards, not voucher inspection policy or procedures!
- Established standardized "Inspectable Areas"
 - · Unit, Inside, Outside
- New categories for health and safety (H&S) deficiencies
 - · Life-threatening, Severe, Moderate, Low
- Standards are different
 - Removed Site and Neighborhood requirements for inspections
 - Things like excessive noise, air pollution, traffic, etc.

 - HOTMA Life-Threatening List is now mandatory for all HUD housing
 Enhanced standards for many of the critical health areas (e.g., HVAL, mold, infestation, fire
 - Implemented congressional changes (e.g., smoke detectors, carbon monoxide).
 - · Provided a much more detailed process for inspectors for how conduct an inspection and observe each standard and deficiency.

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Voucher Correction Timeframes





Life-Threatening Deficiencies require correction within 24 hours of notification.



Severe and Moderate Deficiencies require correction within 30 days (or PHA approved extension).



Low Deficiencies do not require correction in Voucher programs. For information purposes only (similar to previous "Pass with Comment").

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LRO With PHA turnover, many people might not know what HOTMA is. Would it be better to say that HUD has standardized the list of life threatening deficiencies for all HUD programs, or is there a reason to reference HOTMA in this context?

Rawson, Laure, 2024-08-14T14:53:41.290

KMO 0 HOTMA LT List is the actual terminology used, but we can play with this.

Kitchen, Dana M, 2024-09-11T15:59:39.373

WZ0 1 "LT is now mandatory for all HUD housing"

White, William Z, 2024-09-11T16:49:47.921

WZ0 2 Compare and contrast slide, this is what is changing, this is what stays the same slide, side by side

White, William Z, 2024-09-11T16:50:58.657



Debunking Myths of NSPIRE for Vouchers



- PHAs can begin anytime: The Standards have been available since their release and NSPIRE HQS inspections could have started as soon as inspectors became familiar with these Standards and all administrative work was completed. There is no special technology needed and PHAs can proceed as they did with previously defined HQS.
- **HQS Terminology:** The HQS terminology isn't going anywhere. It remains in regulatory and statutory language and voucher inspections will still be HQS inspections. The Housing Quality Standards themselves are being replaced with NSPIRE standards.
- No Scoring: HQS inspections remain Pass/Fail under NSPIRE.
- **H&S Determinations and Correction Timeframes**: Only Life-Threatening conditions require 24-hour correction. Non-life-threatening, or Severe and Moderate, deficiencies require a 30-day correction (or a PHA reasonable extension). Low deficiencies do not require a correction and do not result in a Fail (for information purposes only).
- **Self-Inspections**: *No such requirement* for HCV, PBV, or Mod Rehab programs.

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Debunking Myths of NSPIRE for Vouchers (continued)



- **Reporting**: Voucher program inspection results are not reported to HUD (except to the extent required by 50058 data or SEMAP data, and if requested by HUD).
- Scope of Inspections: Only the assisted unit, or unit to be assisted, and the inside common areas and outside/exterior areas servicing the unit should be inspected. This would include the paths of travel for the tenant, the utility rooms servicing the unit or providing any communicating openings, any common areas they would or could access, etc.
- State and Local Codes: State and local codes are not part of the inspection for Voucher programs (unless approved as Variations by HUD). This is not a "whichever is stricter" situation. Inspectors are only to inspect for NSPIRE standards in the voucher programs, not also any local requirements in addition.
- App for NSPIRE: HUD's app for Voucher programs is not planned to be a centralized program and will not collect and store data.



What's Next for Vouchers?



- HQS Guidebook Chapter ---- Coming Soon! @
- Voucher App for NSPIRE ---- Coming Soon!
- Inspection Criteria Variation Reviews Ro
 - If still using HQS as previously defined, PHAs can continue to use any HUD-approved variations to HQS (except for unvented, fuel-burning space heaters), but all variations to NSPIRE Standards will need to be approved by REAC prior to implementation.
 - Any local housing codes or conditions are Variation requests, whether individual, multiple, or entire codes or variations to NSPIRE/HQS.
- Alternative Inspection Methods Reviews LR1
 - These are inspection methods used for other housing assistance types that PHAs want to rely on for voucher programs. PHAs must have any HUD-approved Alternative Inspection Methods re-reviewed by REAC (except those already pre-approved by RGG) guilation).
 - Note that Alternative Inspection Methods can only be used for initial move-ins, not payments on HAP. PHA
 inspections must still be done in order to make payments.

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Resources and Training



- HCV Tool/Checklist for NSPIRE
 - HUD's NSPIRE checklist for voucher inspections has been posted to the website since September 2023 (https://www.hud.gov/program_offices/public_indian_housing/reac/nspire).
- Training _{IR0}
 - NEW!!! HCV Inspector training is now available on HUD Exchange (https://www.hudexchange.info/programs/public-housing/nspire-standards-how-to-inspect/).
 - · May 28 webinar has been posted (https://www.hud.gov/program_offices/public_indian_housing/reac/nspire/webinars)
 - Upcoming NSPIRE for Vouchers Get-Ready Session July 16 webinar!
- Other Important NSPIRE Resources
 - NSPIRE Notices: https://www.hud.gov/program_offices/public indian_housing/reac/nspire/notices
 - NSPIRE Main Website: https://www.hud.gov/program_offices/public_indian_housing/reac/nspire
 - Email: NSPIRE@hud.gov

LRO I think it would be helpful to provide more details on variations, how to get them approved, and some examples.

Rawson, Laure, 2024-08-15T14:13:33.625

KM0 0 The details of that are still being worked out so not much to say but we can certainly work on putting the process for sending to us back in (we had it in previous versions but felt like a lot of info for very few PHAs so consolidated).

Kitchen, Dana M, 2024-09-11T16:01:24.607

WZ0 1 "Until the variations are improved, you are unable to use them"
White, William Z, 2024-09-11T17:00:05.121

WZ0 2 Advice to PHAs that will submit in the future

White, William Z, 2024-09-11T17:00:37.763

LR1 OPVHP could potentially provide more details on alternative inspections.

Rawson, Laure, 2024-08-15T14:14:05.938

KM1 0 Same as above. but also I think any info OPHVP can offer would be great. I thought we had it covered in the bullets (most of it, but we'd love more). Although again, we have gotten zero requests for these, so not sure we should make a big deal of it or not.

Kitchen, Dana M, 2024-09-11T16:02:43.122

BG2 So that it's clear to PHAs, it could be helpful to add that the approved methods include LIHTC and HOME i

Brienza, Claudia G, 2024-09-11T17:02:35.671

Slide 14

LRO I found another training when putting together HCV landing page, is there a reason not to include it?

https://www.hudexchange.info/trainings/nspire-inspector-training/Rawson, Laure, 2024-08-14T16:17:48.897

KM0 0 the training you found is also on the page listed on the slide. It is the first link (NSPIRE Inspector Training). We don't want them to go only to that limited version, though, without seeing the new videos as well.

Kitchen, Dana M, 2024-09-11T16:05:26.153

WZ0 1 We could explain the link tree here***Follow this to get here.....

White, William Z, 2024-09-11T17:03:49.141

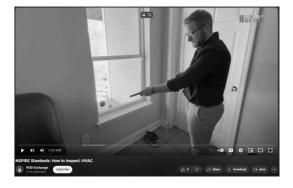


HCV Inspector Training Available!



HCV Inspector training is now available as text and video format





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NSPIRE for Vouchers: Standards

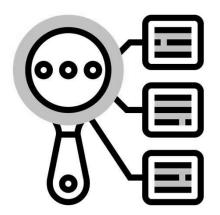


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Standards Notice





The Standards Notice detailed inspectable items at all HUD Housing.

This includes a classification of which conditions are considered life-threatening, severe, moderate, or low-risk by item and inspectable area.

HUD will update these Standards through future Federal Register notices at least once every 3 years with an opportunity for public comment and feedback.

- Published on June 22, 2023
- Full Standards Notice found on the Federal Register
- REAC web/PDF versions should be duplicates of FRN Attachment (except these include inspection process and not rationale)



Changes from HQS to NSPIRE



Mastering the NSPIRE standards will require learning a new framework

- More Emphasis on:
 - · Health, safety, and functional defects
 - Areas that impact residents their units
- · Less Emphasis on:
 - Condition and appearance defects
 - Inspectable areas outside units
- Objective Deficiency Criteria
 - Removed subjective deficiency criteria
 - Less inspector discretion

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Health & Safety Determinations



Life Threatening HCV=24 Hrs



Deficiencies that, if evident in the home or on the property, present a high risk of death or severe illness or injury to a resident.

Severe HCV=30 days



Deficiencies that, if evident in the home or on the property, present a high risk of permanent disability, or serious injury or illness, to a resident; or the physical security or safety of a resident or their property would be seriously compromised.

Moderate HCV=30 days



Deficiencies that, if evident in home or on property, present a moderate risk of an adverse medical event requiring a healthcare visit; cause temporary harm; or if left untreated, cause or worsen a chronic condition that may have long-lasting adverse health effects; or that the physical security or safety of a resident or their property could be compromised.

Low HCV=NA



Deficiencies critical to habitability but not presenting a substantive health or safety risk to residents.

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Inspectable Areas

NSPIRE

Unit

A "Unit" of housing refers to the interior components of an individual dwelling, where the resident lives.



Inside

"Inside" refers to the common areas and building systems within the building interior and are not inside a unit. This could include interior laundry facilities, workout rooms, etc.

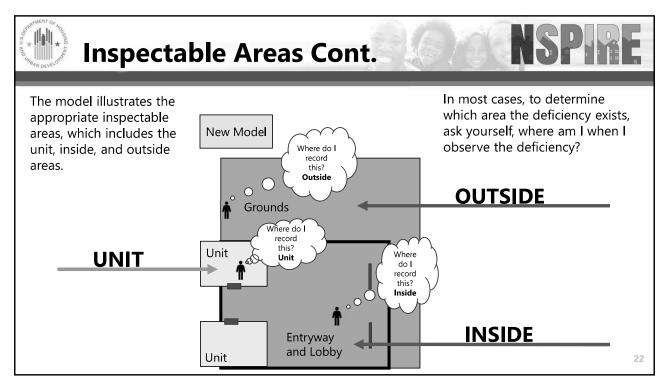


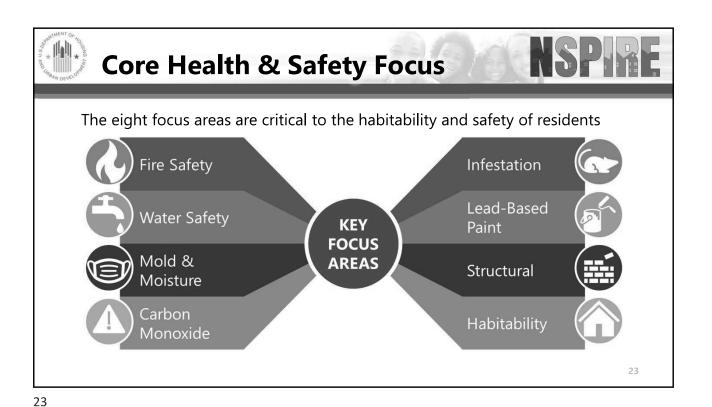
Outside

"Outside" refers to the building site, building exterior components, and any building systems located outside of the building or unit. This includes things like sidewalks, parking lots, and retaining walls.



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Addressing Fire Safety Cont.



NSPIRE conforms with (NFPA 72)

 NFPA 72 is the preeminent national standard for smoke alarms and fire and existing Housing Quality Standards for vouchers align with this standard

NSPIRE Smoke Alarm Standards Conform with 2019 NFPA 72 Requiring:

At least one working smoke alarm installed on every level of property At least one working smoke alarm installed outside every sleeping area At least one working smoke alarm installed inside each sleeping area

• Lack of conformance with the NSPIRE smoke alarm standard requires mitigation within 24 hours.

Effective December 29, 2024, new requirements for all smoke alarms:

• **MUST** be either hardwired or sealed, 10-yr battery devices.

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Addressing Fire Safety Cont.

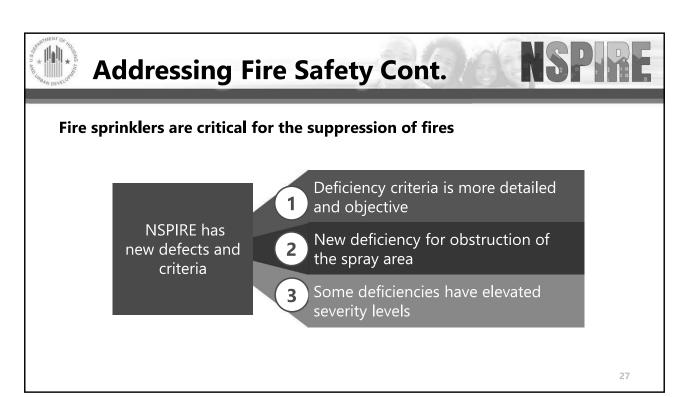


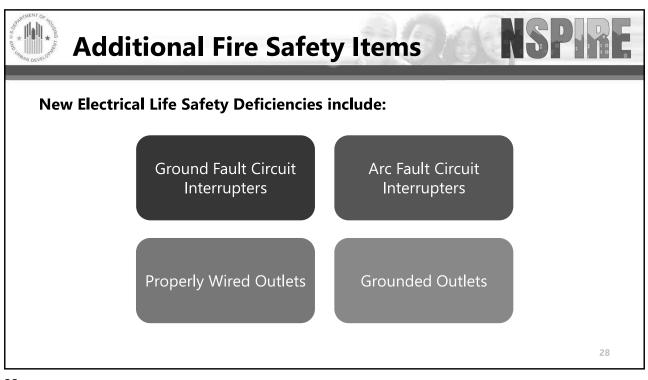
Properly functioning fire doors are critical to slow the spread of an active fire in buildings

Fire doors have been addressed in NSPIRE with a standard specific to fire doors

Under HQS fire doors were inspected and cited with other non-fire doors The fire door standard details the specific function, operability and structural integrity requirements for fire doors

Defects and deficiency criteria will be based on research and discussions with fire safety professionals







Addressing Fire Safety Cont.



Properly functioning and safe heating systems are critical to maintain healthy unit temperatures and prevent fires in public housing

Housing Opportunity through Modernization Act directed HUD to set minimum temperature standards

- Notice PIH 2018-19 set a minimum heating temperature standard for HUD Housing.
- The minimum heating temperature was set at 68 degrees and is carried over into NSPIRE Standards.

NSPIRE Standards contain the heating source & space heater requirements

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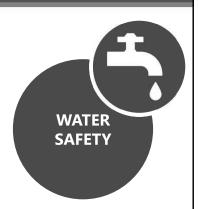


Water Safety

NSPIRE

Water Safety in Voucher Programs

- HUD recognizes the EPA is the government agency tasked with testing and measuring water quality
- There is no NSPIRE Standard for Water Safety or Water Testing.
- Water Safety is <u>NOT</u> being addressed in Voucher programs at this time.



LR0 What is the actual standard related to water safety for HCV inspections?

Rawson, Laure, 2024-08-14T21:25:33.892

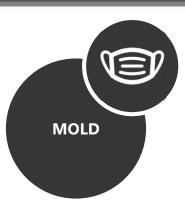


Addressing Mold & Moisture

NSPIRE

NSPIRE takes a comprehensive approach to mold and moisture

- Objective and measurable mold deficiency criteria that recognizes different severity levels
- The mold standard also contains a deficiency for ventilation or dehumidification of bathrooms
- The leak standard contains multiple deficiencies with specific criteria to capture a broad range of plumbing and environmental leaks
- NSPIRE requires the use of moisture meters and recommends the use of infrared cameras during inspections
 - PHAs must ensure their inspectors are equipped with a moisture meter for inspections of all voucher units.



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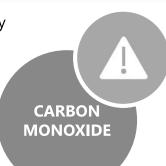
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Carbon Monoxide Alarms



- 2021 Consolidated Appropriations Act included a statutory requirement for CO alarms to be installed with the requirements of the 2018 International Fire Code
 - Notice PIH 2022-01 published January 31, 2022, for the implementation of the CO requirements into UPCS and HQS.
 - Effective date of requirement was December 27, 2022
 - Chapters 9 & 11 of the 2018 IFC contain the specific installation requirements & are available free online (link in resources slide)
 - <u>Decision tree for CO installation guidance</u> published to HUD's website December 2022.



LRO Does this relate to scoring under PH inspections? I think it should be deleted because I don't think it applies to HCV Inspections.

Rawson, Laure, 2024-08-14T21:23:19

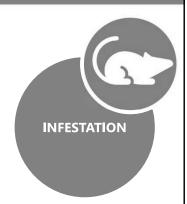


Addressing Infestation

NSPRE

NSPIRE infestation standards include:

- · Objective deficiency criteria
 - Specific observed numbers of pests result in different severity levels
- NSPIRE allows alternative correction options and longer time frames for properties using industry best practices
 - An example of best practices would be integrated pest management



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Vouchers Lead-Based Paint



LRO

- NSPIRE makes no changes to the Potential Lead-Based Paint Hazards Standard for the Voucher Programs
 - The Standard incorporates the requirements from HUD's Lead Safe Housing Rule.
 - In housing constructed prior to 1978, the PHA inspector must perform a visual assessment for deteriorated paint in units where a child under the age of 6 resides or is expected to reside.



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Recommend removing since UPCS didn't apply to HCV. Rawson, Laure, 2024-08-14T21:26:31.163



Affirmative Requirements – Kitchen and Bathroom



The table below contains affirmative habitability requirements (new standards/defects) for the kitchen and bathroom:

Standard		New Affirmative Requirement (Deficiency)
Bathtub and Shower	\Rightarrow	Bathtub or shower cannot be used in private
Cabinet and Storage	\Rightarrow	Food storage space is not present
Cooking Appliance	\Rightarrow	Primary cooking appliance is missing
Food Preparation Area	\Rightarrow	Food preparation area is not present
Lighting – Interior	\Rightarrow	At least one permanently installed light fixture is not present in the kitchen and bathroom
Refrigerator	\Rightarrow	Refrigerator is missing
Sink	\rightarrow	Cannot activate or deactivate hot and cold waterSink is missing or not installed within the primary kitchen



Affirmative Requirements (Cont.)



Standard		New Affirmative Requirement (Deficiency)
Carbon Monoxide Alarm	⇒	Carbon monoxide alarm is missing, not installed, or not installed in a proper location
Heating, Ventilation, and Air Conditioning		 The inspection date is on or between October 1 and March 31 and the permanently installed heating source is not working or the permanently installed heating source is working and the interior temperature is below 64 degrees Fahrenheit. The inspection date is on or between October 1 and March 31 and the permanently installed heating source is working and the interior temperature is 64 to 67.9 degrees Fahrenheit. Unvented space heater that burns gas, oil, or kerosene is present. The inspection date is on or between April 1 and September 30 and a permanently installed heating source is damaged inoperable, missing, or not installed.
Guardrail	\Rightarrow	Guardrail is missing or not installed
GFCI/AFCI – Outlet or Breaker	⇒	An unprotected outlet is within six feet of a water source
Handrail	\Rightarrow	Handrail is missing (evidence of prior installation)
Minimum Electrical and Lighting	⇒	At least two (2) working outlets are not present $\sqrt{LR1}$ n each habitable room OR At least one (1) working outlet and one (1) permanently installed light fixture is not present within each habitable room.
Smoke Alarm	\Rightarrow	Smoke alarm is not installed where required

LRO These aren't necessarily new for HQS. Maybe change the description to get rid of parenthetical.

Rawson, Laure, 2024-08-14T21:30:18.796

Slide 36

LRO What if the inspection date is between 10/1 and 3/31, and the permanently installed source is not working, and the interior is 64-67.9 degrees? There seems to be a gap between the two standards, or maybe I am missing something?

Rawson, Laure, 2024-08-15T13:50:59.422

What if a handrail is missing for 4 or more stairs, but it was never present - no evidence of prior installation)? Isn't one still required?

Rawson, Laure, 2024-08-15T13:54:24.831



NSPIRE Standards Webpage



You can find the standards on the NSPIRE Standards web page:

This web page provides:

- Ability to view the standards and download:
 - Single standards
 - o All standards in a zip file
- Guidance for navigating the standards

Final Standards

CTANDADDC	Inspectable area(s) standard applies to:			
STANDARDS	Unit	Inside	Outside	
Address and Signage Standard			Y	
Bathtub and Shower Standard	Y	Y		
Cabinet and Storage Standard	Y	Y		
Call-for-Aid System Standard	Y	Y		
Carbon Monoxide Alarm Standard	Y	Y		
Ceiling Standard	Y	Y		
Chimney Standard	Y	Y	Y	

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NSPIRE Standards Template Guide



To help inspectors, quality control reviewers, and other stakeholders understand the terminology and layout of the NSPIRE standards, HUD developed a standards template guide to provide:

- Terminology
- Layout of the standards
- An overview of each component section of a standard, from front to back

MOPI					NATIONAL STANDARDS FOR THE PHYSICAL INSPECTION OF REAL ESTATE					
TITLE:	States	the title of	the standard							
VERSION:	States the version of the standard (e.g., VI.3)									
DATE PUBLISHED:	Lists the date the version of the standard was published (e.g., 7/31/20)									
DEFINITION:	Defines	the standard								
PURPOSE:	States the function, use, or purpose the item serves in the built environment, if applicable (i.e., if the standard refers to an item)									
NAME VARIANTS:	Lists other possible names that refer to the item									
COMMON MATERIALS:	Lists the most common materials that make up the item (e.g., wood, metal)									
COMMON COMPONENTS:	Lists the	mest commo	я сопролекта б	hat m	make up the item (e.g., shower head, fauces, drain)					
LOCATION:		Unit	This box is selected if the applicable inspectable area is within the unit							
		Inside			lected if the applicable inspectable area is within the interior area, but not the unit smoon areas)					
		Outside	This bax is	selec	ected if the applicable inspectable area is outside the dwelling					
HORE INFORMATION:	States additional information that is relevant to the item									
DEFICIENCY 1:			ble to the stan		E. Below, the boxes are selected to define whether the specific deficiency applies to the					
LOCATION-	□ thir] Inside		☐ Outside					

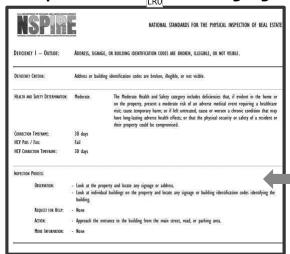
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Deficiencies - Inspection Process



Example Standard: Address, Signage



Each deficiency includes an Inspection Process section:

- Observation
- Request for Help (e.g., from owner or resident)
- Action
- More Information

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Resources and Training



- NSPIRE/Federal Register Notice
 - https://www.federalregister.gov/documents/2023/05/11/2023-09693/economic-growth-regulatory-relief-and-consumer-protection-act-implementation-of-national-standards
- 2018 International Fire Code (IFC) Chapters 9 & 11 For CO Alarms
 - https://codes.iccsafe.org/content/IFC2018
- U.S. Department of Housing and Urban Development (HUD)-Carbon Monoxide Alarms or Detectors in HUD assisted housing properties
 - https://www.hud.gov/sites/dfiles/PIH/documents/PIH2022-01.pdf

LRO Since this is HCV focused, I think it would be good to highlight the HCV Pass/Fail and HCV Correction Timeframe.

Rawson, Laure, 2024-08-15T13:56:32.162

