

C4N6

Constructive
Forensics

HUD-REAC TRAINING

Resource Book

HUD ASSIST
powered by
CONSTRUCTIVE FORENSICS

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NSPIRE – The New REAC Inspection

- NSPIRE = National Standards for the Physical Inspection of Real Estate
- The “2-year” Demonstration began in late 2019
 - The current extension of the Demo was through June 30, 2023 for PHAs
 - The current extension of the Demo is through September 30, 2023 for MF and HCV properties
- Approximately 4,500 properties from a pool of volunteers were part of the NSPIRE Demo
 - HUD only conducted 2,335 NSPIRE inspections on MF and PHA - they spent most of their time in HCV units where they have conducted over 9,200 NSPIRE-V inspections.
- https://www.hud.gov/program_offices/public_indian_housing/reac/nspire
- The Demo was conducted to test a protocol that would improve objectivity, defensibility and accuracy for a more reliable assessment of housing conditions
- The scope of the inspection, procedural guidelines and many individual deficiencies have been modified to remove subjectivity, ambiguity, and to emphasize those areas that present the highest risk of harm for those living in HUD housing.
- This program will completely overhaul the current 25-year old UPCS inspection protocol (aka REAC Inspections)
 - New software
 - New Protocol
 - New scoring model

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UPCS = Decent, Safe, Sanitary and in Good Repair

NSPIRE = FUNCTIONALLY ADEQUATE

OPERABLE

FREE OF H&S HAZARDS



NSPIRE Demonstration Details

- The primary difference between NSPIRE and UPCS is that NSPIRE gives precedence to the Units over the physical condition of other areas of the property.
- NSPIRE aligns multiple HUD programs (Loans, PHA, HCV, etc) to a single set of Standards
- The inspections will be flexible based on the needs of the program
 - Properties subject to scored UPCS inspections will get a scored NSPIRE inspection
 - Tenant-based programs (HCV) will have a pass/fail result like they do for HQS inspections
- Federal programs may have unique protocols for how the standards are applied – HUD will provide this information in future notices
- To improve objectivity, accuracy and consistency many things were tested during the demonstration:
 - Standards
 - Protocols
 - Processes
 - A primary goal was to have different inspectors inspect the same property and arrive at similar outcomes
 - Assess whether deficiencies needed to be added to or removed from the current Standards

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Housing Choice Voucher (HCV) Specific Details

From the NSPIRE Get Ready Sessions:

- NSPIRE for HCV inspections are expected to begin on 10/1/23 and will replace HQS
 - They will forevermore be called NSPIRE-V inspections
- The NSPIRE inspection will be conducted on an updated HUD-52580 *
 - The current form expires 04/30/2026
- Inspectors can use the paper HUD-52580 form or software on a tablet *
- Housing Authorities can elect to start NSPIRE on 10/1/2024 (keeping HQS for another year) *
 - You MUST report this choice to HUD’s field office (not DC) *

*HCV/PBV/CPD programs:

“HUD will issue additional Departmental notices before 10/1/2023”*

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NSPIRE Details (con't)

- NSPIRE used to encompass the “Rule of Three”
 - ✓ 3 Types of Inspections (accurate)
 1. Property Owner/Agent (POA Self Inspections)
 2. REAC Contracted Inspections (NSPIRE)
 3. HUD QA (Quality Assurance) Inspections (NSPIRE+)
 - ***CTQ = Critical to Quality – what HUD used to call the deficiencies within the Standards***
 - ✓ 3 Categories of Deficiencies – (now 4)
 1. Health & Safety (4 types of H&S)
 2. Function & Operability } Not cited
 3. Condition & Appearance }
 - ✓ 3 Inspectable Areas (Yes there are 3 areas...but NOT 50%/25%/25%)
 1. Unit (worth 50% of score)
 2. Inside (worth 25% of score)
 3. Outside (worth 25% of score)

3 Types of Inspections

1. Properties to conduct Annual Self-Inspections (aka surveys)
 - Public Housing and Multi-Family (ONLY the MF with assistance contracts) are required to complete an annual self-inspection
 - They are required to keep a copy of their annual self-inspection for 3 years
 - Per the **NSPIRE Final Rule** page 18 and 177, if you score **ABOVE a 60**, the survey may be limited to inspecting for deficiencies based on the NSPIRE inspection’s findings.
 - **Below a 60**, you will need to conduct a full survey of the entire property AND submit the survey reports within 60 days to NSPIRERegulations@hud.gov with a courtesy copy to the assigned field office representative until the online NSPIRE system can receive the submission.
 - **Only the properties that score under 60 will be required to electronically transmit the self-inspection to HUD – and must adhere to NSPIRE Standards**
 - The transmitted reports will be used as part of the “follow-up” for failing properties - not for any scoring purposes. **HUD could request additional documentation, like work orders, during the follow-up**
 - Are **NOT REQUIRED** for all programs such as HCV, PBV, Moderate Rehabilitation Programs and Community Planning and Development Programs (ex. Home, HTF)

3 Types of Inspections con't.

2. Contracted Inspections (NSPIRE) and PHAs (for HCV – called NSPIRE-V)
 - Conducted by certified contract inspectors (or PHA employees/contracted agencies for HCV only)
 - Inspect for a narrower range of deficiencies (in comparison with self-inspections) using the NSPIRE Standards
 - Intended to provide HUD a high level of confidence in the inspection results
3. HUD Quality Assurance Inspections (NSPIRE+)
 - Conducted by federally employed inspectors (QA) when HUD needs enhanced information about a property
 - Used to verify NSPIRE inspection outcomes
 - Can be requested by other HUD offices or triggered by poor property conditions
 - Provide the highest level of confidence regarding a property’s condition as well as the evidentiary data needed to justify and support enforcement actions, if needed.

	PHA and MF Properties	Housing Choice Voucher Properties
Self-Inspections Who: Property Owners / Management What: All deficiencies reported to HUD When: Once a year Where: All units Why: To gain reasonable level of confidence in results & to ensure work orders are being generated.	✓	✗
CTQ Inspections NSPIRE Who: Contract Inspectors and PHAs What: CTQs When: Periodic inspections (1-5 years) Where: High sample rate Why: To gain high level of confidence in results.	✓	✓
NSPIRE + CTQ+ Inspections Who: HUD Federal Inspectors What: CTQ+ When: Requested, or triggered by poor conditions Where: Highest sample rate Why: To gain highest level of confidence in results.	✓	✗

4 Categories of Deficiencies



- 4 categories: Life-Threatening, Severe, Moderate and Low
- NSPIRE will focus heavily on Health & Safety Deficiencies making up most of the deficiencies in the standards
- H&S deficiencies will be discussed further in a few minutes



ROUTINE MAINTENANCE

How HUD Determines NSPIRE Deficiencies

- ❖ Surface Rust
 - Superficial – water heater still functions as intended
 - Does not meet the level of harm HUD has identified as a NSPIRE deficiency
 - Should be identified during self-inspection and addressed as normal routine maintenance
- ❖ Discharge Pipe (PRV) Moderate H&S (Indirect)
 - Terminates more than 6 inches from the floor
 - A resident could be scalded because of this condition
 - Corrective action required within 30 days
- ❖ Misaligned Chimney/Flue – Life-Threatening
 - Dangerous gases can collect within a building or unit due to the misalignment
 - It meets the severe life-threatening definition and should be repaired within 24 hours.



Low (fka Advisory) Deficiencies

- ✓ Function & Operability and Condition & Appearance used to be considered Low Deficiencies
- ✓ As of 5/11/23 per the NSPIRE Final Rules, HUD now lists Low Deficiencies as a Health and Safety
- ✓ **60 days to repair** per the Final and Effective published rule on 5/11/23
- ✓ Defined as: “Deficiencies critical to habitability but not presenting a substantive health or safety risk to the resident.”
- ✓ ONLY the following Low Deficiencies will be considered a “PASS” for a NSPIRE-V inspection
- ✓ These are ALL of the Low Deficiencies in the NSPIRE Standards

Low Deficiencies – requires repair in 60 days	Location Recorded
Only 1 bathtub or shower is present and it is inoperable or does not drain	Inside
A bathtub/shower is inoperable or does not drain and at least 1 bathtub/shower is present elsewhere that is operational	Inside
Bathtub/shower component is damaged, inoperable, or missing that <u>may</u> limit the resident's ability to maintain personal hygiene	Inside
Bathtub/shower component is damaged, inoperable, or missing and it does <u>not</u> limit the resident's ability to maintain personal hygiene	Unit
50% or more storage components are damaged, inoperable or missing	Inside
Cooking range, cooktop, or oven does not ignite or produce heat	Inside
Entry door component is damaged, inoperable, or missing and it does not limit the door's ability to provide privacy/protection from weather/infestation	Unit/Inside
A passage door component is damaged, inoperable, or missing and the door is not functionally adequate	Unit/Inside
A passage door that is not intended to permit access between rooms has a damaged, inoperable, or missing component	Unit
Exterior dryer vent cover, cap, or a component thereof is missing	Outside
Handrail not installed where required (HUD has error where Deficiency is not categorized)	Unit*/Inside/Outside
Air conditioning system or device is not operational	Inside
Litter is accumulated in an undesignated area	Outside
Plumbing Leak	Outside
Fluid is leaking from sprinkler assembly	Outside
Presence of mold-like substance at moderate levels is observed visually	Inside
Elevated moisture level	Inside

Low Deficiencies Con't. (Total of 26)

Sink or sink component is damaged or missing and the sink is NOT functionally adequate	Inside
Sink – Water is directed outside of the basin	Inside/Unit
Sink or sink component is damaged or missing and the sink IS functionally adequate	Inside/Unit
Water runoff is unable to flow through the site drainage system	Outside
Erosion is present	Outside
Toilet component is damaged, inoperable, or missing and it does not limit the resident's ability to discharge human waste	Unit/Inside
No hot water	Inside
Window will not open or stay open (as long as there are other egressable windows in that room)	Inside
Window cannot be secured	Inside

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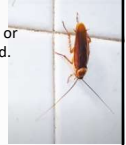


Health & Safety



Moderate Health & Safety

- Deficiencies that present a moderate risk of an adverse medical event, cause temporary harm, or could cause or worsen a chronic condition; or physical security or safety could be compromised.
- As the potential outcomes are less than severe, more time can be taken to eliminate the risk
 - 30 days to repair/correct



Severe (NLT)

- Deficiencies that 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
 - 24 hours to repair/correct



Life-Threatening

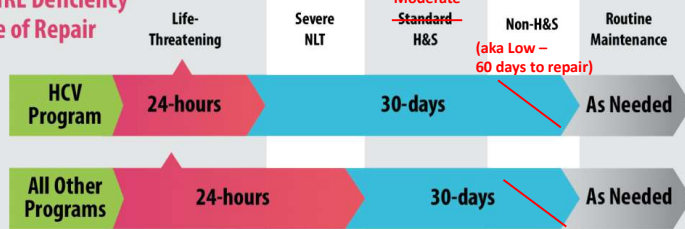
- Includes deficiencies (hazards) that present a high risk of death to a resident
 - 24 hours to repair/correct

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Health & Safety

NSPIRE Deficiency Time of Repair



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Some of the most unreasonable/outrageous 24-hour required repairs (NOT a complete list)

- Structural system exhibits signs of serious failure
- ~~Foundation appears to be in imminent danger of collapse or failure.~~
- Fire-labeled doors – whether it's a hole of any size or the seal/gasket is missing/damaged or self-closing hardware does not work
- Bldgs built **prior to 1978** and there is >2 sq ft peeling paint per room OR >10% per component or >20 sq ft outside
- Paint or foreign material on sprinkler head assembly. (More than 75% of the assembly OR bulb)
- Extensive cockroach/bedbug/mouse/rat infestation

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2023 Repair Reporting Update

- HUD realizes that the 24-hour and 30-day repair requirements are not practical nor sustainable and state they will accept a time-line communication of the repair.
- ✓ For LT and Severe Deficiencies, “Corrected” will mean that the PHA/POA has
 1. Completed all the repairs, or
 2. Has controlled/blocked access to the hazard (temporarily)
 3. Temporarily relocate the resident while repairs are made
 - “Residents should be temporarily relocated until mold and moisture conditions are controlled” (Page 15 of the Admin Notice)
- Since this will all be reported online, the deficiency will remain “open” until the repair is complete.
- You will also be able to condense your reporting, for instance, if you have 20 smoke alarms recorded during your inspection, you could upload that “20 smoke alarms repaired/replace on x date” instead of reporting on each individual one.
- **Per the Final Rule, ONLY LT and Severe H&S will have the repair reporting requirement – not Moderate H&S or Low deficiencies**

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2023 Repair Reporting Update (cont.)

- ❖ The 24-hour correction timeframe commences immediately upon notification by the inspector and does
 - **NOT PAUSE FOR NON-WORKING HOURS, INCLUDING WEEKENDS!**
- ❖ If you can’t permanently repair something within 24 hours, you must provide HUD with a timeframe **and get HUD’s approval in writing**. This should be conducted via email to the field office representative with a courtesy copy to NSPIRERegulations@hud.gov until HUD gets the NSPIRE System fully operational.
- ❖ All evidence of repair must be submitted within 48 hours after the 24-hour deadline (allowing 72 hours for the full process) Evidence includes:
 - Work orders
 - Invoices
 - Photos (as long as it matches the deficiency photo)

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3 Inspectable Areas



- ❖ **UNIT**
 - Refers to the interior components of an individual unit
- ❖ **Inside**
 - Refers to the common areas and building systems generally found in the building interior and are not inside a unit
- ❖ **Outside**
 - Refers to the Building Site, Building Exterior components and any Building Systems located outside a building or unit

- This allows inspectors to cite deficiencies based on where they are standing and will reportedly remove subjectivity or ambiguity about a deficiency’s location
- Location may change the impact on resident health & safety – this will be clearly described in the rationales
- For Example: An inoperable toilet in a unit may have a different rationale and health & safety classification than one in a common area.

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Scoring – Differences between UPCS and NSPIRE

UPCS	NSPIRE
Complex system of weightings, multipliers, and limits	Simplified four-step scoring system
Unsafe properties could still receive a passing score for a variety of reasons, including mechanisms of “capped” item and area weights	Unsafe properties will not receive a passing score due to focus on Health & Safety and Unit-based defects
Item and area weights could sometimes cause less important defects to disproportionately factor into inspection scoring	Defect Impact Weights Table makes clear the hierarchy of defect importance on Inspection Score

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Defect Severity Category	Inspectable Area*		
	Outside	Inside	Unit
Life-Threatening (LT) (most severe)	49.6	54.5	60.0
Severe	12.2	13.4	14.8
Moderate	4.5	5.0	5.5
Low	2.0	2.2	2.4

*Defect impact weights are rounded to the tenths place

Under the **draft** NSPIRE Scoring Model, the steps to score an inspection are as follows:

- Count defects of each type. Multiply counts by values in Defect Impact Weights table (shown in the previous slide). Sum all results. Calculation yields **total defect points**.
- Size-adjust **total defect points**.
 - Divide total defect points by number of units inspected to adjust for property size
- Subtract **size-adjusted defect points** from 100 to calculate **0-100 score**.
- Sum **defect points in units category**, then divide by total number of units sampled. If less than 30 the property passes the "Unit Standard of Performance" test.

$$5 \text{ LT} \times 49.6 = 248 \text{ Outside defect points}$$

$$248 \text{ Outside defect points} \div 10 \text{ units} = 24.8 \text{ size-adjusted defect points}$$

Defect Severity Category	Total Number of Deficiencies		
	Outside	Inside	Unit
Life-Threatening	0	0	5
Severe	0	0	8
Moderate	0	0	56
Low	0	0	42

Property Z is 22 Building and 97 Units
21 Units were inspected
REAC/UPCS SCORE: 70

Defect Severity Category	Inspectable Area*		
	Outside	Inside	Unit
Life-Threatening (LT)	49.6	54.5	60.0
Severe	12.2	13.4	14.8
Moderate	4.5	5.0	5.5
Low	2.0	2.2	2.4

Defect Severity Category	Outside	Inside	Unit
Life-Threatening	0	0	300
Severe	0	0	118.4
Moderate	0	0	308
Low	0	0	100.8
Total by Inspectable Area	0	0	827.2
Size-Adjusted for 21 Units (Divide)	0	0	39.39
Final score (subtract from 100)			60.61

⚠️ 30 so the inspection fails with an automatic score of 59

Defect Severity Category	Defect Description	Defect Severity Category	Defect Description	Defect Severity Category	Defect Description
Life-Threatening	Call-for-Aid System - Blocked or pull cord is higher than 6 inches from the floor	Severe	Fire Extinguisher - Service tag is missing, illegible, or expired	Moderate	Carbon Monoxide Alarm - Missing, not installed, or not installed in a proper location
Life-Threatening	Call-for-Aid System - System does not function properly	Severe	Fire Extinguisher - Damaged or missing	Moderate	Carbon Monoxide Alarm - Flammable and Combustible Item - Item is on or within 3 feet of an appliance that provides heat for thermal comfort or a fuel-burning water heater or improperly stored chemicals
Life-Threatening	Carbon Monoxide Alarm - Missing, not installed, or not installed in a proper location	Severe	Guardrail - Missing or not installed (more than 30 in above floor/grade below)	Moderate	Carbon Monoxide Alarm - Obstructed
Life-Threatening	Carbon Monoxide Alarm - Obstructed	Severe	Guardrail - Not functionally adequate - missing/damaged components, less than 30 in high, not securely attached	Moderate	Carbon Monoxide Alarm - No audio or visual alarm when tested
Life-Threatening	Carbon Monoxide Alarm - No audio or visual alarm when tested	Severe	HVAC - 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	Moderate	Chimney - Incomplete or damaged
Life-Threatening	Chimney - Incomplete or damaged	Severe	HVAC - Unvented space heater that burns gas, oil, or kerosene is present	Moderate	Clothes Dryer Exhaust Ventilation - Electric dryer transition duct is detached or missing
Life-Threatening	Clothes Dryer Exhaust Ventilation - Electric dryer transition duct is detached or missing	Severe	HVAC - Combustion chamber cover or gas shutoff valve is missing from a combustion-fueled heating appliance	Moderate	Clothes Dryer Exhaust Ventilation - Gas dryer transition duct is detached or missing
Life-Threatening	Clothes Dryer Exhaust Ventilation - Gas dryer transition duct is detached or missing	Severe	HVAC - Fuel burning heating system or device exhaust vent is misaligned, blocked, disconnected, improperly connected, damaged, or missing	Moderate	Clothes Dryer Exhaust Ventilation - Electric dryer exhaust ventilation system has restricted airflow
Life-Threatening	Clothes Dryer Exhaust Ventilation - Electric dryer exhaust ventilation system has restricted airflow	Severe	HVAC - Unvented space heater that burns gas, oil, or kerosene is present	Moderate	Clothes Dryer Exhaust Ventilation - Dryer transition duct is constructed of unsuitable material
Life-Threatening	Clothes Dryer Exhaust Ventilation - Dryer transition duct is constructed of unsuitable material	Severe	Leak - Gas or Oil - Natural gas, propane, or oil leak	Moderate	Clothes Dryer Exhaust Ventilation - Gas dryer exhaust ventilation system has restricted airflow
Life-Threatening	Clothes Dryer Exhaust Ventilation - Gas dryer exhaust ventilation system has restricted airflow	Severe	Mold-Like Substance - Presence of mold-like substance at extremely high levels is observed visually (over 9 sq ft)	Moderate	Door - Entry - Entry door is missing
Life-Threatening	Door - Entry - Entry door is missing	Severe	Smoke Alarm - Smoke alarm is not installed where required (inside bedroom, outside bedroom and on each level)	Moderate	Door - Fire Labeled - Fire labeled door is missing
Life-Threatening	Door - Fire Labeled - Fire labeled door is missing	Severe	Obstructed	Moderate	Egress - Obstructed means of egress
Life-Threatening	Egress - Obstructed means of egress	Severe	Smoke Alarm - Does not produce audio or visual alarm when tested	Moderate	Egress - Sleeping room is located on the 3rd floor or below and has an obstructed rescue opening
Life-Threatening	Egress - Sleeping room is located on the 3rd floor or below and has an obstructed rescue opening	Severe	Sprinkler Assembly - Sprinkler head assembly is encased or obstructed by an item, object, or encasement within 18 inches of the sprinkler head.	Moderate	Egress - Fire escape access is obstructed
Life-Threatening	Egress - Fire escape access is obstructed	Severe	Component is damaged, inoperable, or missing and it is detrimental to performance.	Moderate	Electrical - Conductor, Outlet and Switch - Conductor or switch is damaged
Life-Threatening	Electrical - Conductor, Outlet and Switch - Conductor or switch is damaged	Severe	Sprinkler Assembly - Sprinkler assembly has evidence of corrosion.	Moderate	Electrical - Conductor, Outlet and Switch - Exposed electrical conductor
Life-Threatening	Electrical - Conductor, Outlet and Switch - Exposed electrical conductor	Severe	Sprinkler Assembly - Sprinkler assembly has evidence of foreign material that is detrimental to performance (more than 75% of the sprinkler assembly or glass bulb)	Moderate	Electrical - Conductor, Outlet and Switch - Water is currently in contact with an electrical conductor
Life-Threatening	Electrical - Conductor, Outlet and Switch - Water is currently in contact with an electrical conductor	Severe	Structural System - Exhibits signs of serious failure	Moderate	Electrical - Service Panel - The overcurrent protection device is damaged
Life-Threatening	Electrical - Service Panel - The overcurrent protection device is damaged	Severe	Water Heater - Only 1 toilet was installed, and it is missing	Moderate	Fire Extinguisher - Gauge reads over or undercharged
Life-Threatening	Fire Extinguisher - Gauge reads over or undercharged	Severe	Chimney or flue piping is blocked, misaligned, or missing	Moderate	Water Heater - Water Heater - Gas shutoff valve is damaged, missing or not installed

UNITS
43 - LT
33 - Severe
79 - Moderate

Shortcut Method of Scoring

1. Use the NSPIRE Sample Chart (Slide 44) to determine how many units will be inspected at your property
2. Divide EACH of the values from the Impact Table (slide 24) by how many units will be inspected.

Defect Severity Category	Inspectable Area Actual Point Loss		
	Outside	Inside	Unit
Life-Threatening (LT) (most severe)	1.98	2.18	2.40
Severe	0.49	0.54	0.59
Moderate	0.18	0.20	0.22
Low	0.08	0.09	0.10

Example: If you have 100 units at your property, 25 units will be inspected. Values in table above reflect the ACTUAL point loss for EACH recorded deficiency based on 25 units inspected

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DUPLICATE DEFICIENCIES

*Duplicate deficiencies are recorded but **SCORED ONCE PER INSPECTABLE AREA!!!***

Area	Repeat Region	Plain Language
Unit	Inspected Unit	Defect A can only be scored once in Unit 1 and it can be scored again in Unit 2, Unit 3, etc.,
Inside	Inspected Building	Defect B can only be scored once in Building 1 and it can be scored again in Building 2, Building 3, etc.,
Outside	Outside	Defect C can only be scored once in the entire Outside area

1 + 1 + 1 +



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UPCS

SAME DEFECT + SAME INSPECTABLE AREA =
HIGHEST LEVEL SCORES ONCE NO MATTER HOW MANY TIMES RECORDED

1 painted sprinkler head in Unit 510
3 missing escutcheon in Unit 614
25 painted sprinkler heads in common areas

=

L3 – Sprinkler System
SCORED ONCE
10 points for a 1 bldg/100 unit property

*Duplicate deficiencies are recorded but **SCORED ONCE PER INSPECTABLE AREA!!!***

If Duplicates are NOT scored for Sprinklers

Unit 510 – LT – 2.4 points
Unit 614 – LT – 2.4 points
Inside – LT – 2.18 points

=

1 painted sprinkler head in Unit 510
3 missing escutcheon in Unit 614
25 painted sprinkler heads in common areas (Inside)

If Duplicates WERE scored for Sprinklers

Unit 510 – LT – 2.4 points
Unit 614 – 3 LT – 7.2 points
Inside – 25 LT – 54.5 points

TOTAL OF 64.1 POINTS LOST OUT OF 100
JUST ON SPRINKLERS!!!

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THERE ARE STILL NO SCORE CAPS!!!

UPCS -

Building 23 -		- Unit 293* [Possible Points : 2.14]		NSPIRE	
Non-Health And Safety Deficiencies					
Doors	Unit - Damaged Hardware/Locks (Doors)	Level 2	0.12	0.10	
Doors	Unit - Damaged Surface (Holes/Paint/Rust/Glass) (Doors)	Level 3	0.23	0.59	
Kitchen Items	Unit - Range/Stove- Missing/Damaged/Inoperable (Kitchen)	Level 3	0.77	0.59	
Outlets/Switches	Unit - Missing/Broken Cover Plates (Outlets/Switches)	Level 1	0.05	N/A	
Windows	Unit - Damaged/Missing Screens (Windows) (2)	Level 1	0.03	0.22	
Health And Safety Deficiencies					
Emergency/Fire Exits	HS - Emergency/Fire Exits Blocked/Unusable (Emergency/Fire Exits) (LT)	Level 3	1.70	2.40	
Windows	Unit - Inoperable/Not Lockable (Windows) (NLT)	Level 3	0.23	0.22	
			3.13	0.00	
			4.12		

On a 100 unit property where 25 units are inspected

UPCS -

Site – 7.5
Exterior – 10
Systems – 10
Common Areas – 10
Units - 5



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Unit 108 has electricity turned off

Deficiency	Severity	Size-Adjusted Point Loss
THE INSPECTION DATE IS ON OR BETWEEN OCT 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	LT	2.4
GFCI OUTLET OR GFCI BREAKER IS NOT VISIBLY DAMAGED AND THE TEST OR RESET BUTTON IS INOPERABLE	SEVERE	0.59
OUTLET DOES NOT HAVE VISIBLE DAMAGE AND TESTING INDICATOR LIGHT IS NOT ENERGIZED	SEVERE	0.59
NO HOT WATER	SEVERE	0.59
COOKING RANGE, COOKTOP, OR OVEN DOES NOT IGNITE OR PRODUCE HEAT	SEVERE	0.59
A PERMANENTLY INSTALLED LIGHT FIXTURE IS INOPERABLE	MODERATE	0.22
KITCHEN EXHAUST SYSTEM DOES NOT RESPOND TO THE CONTROL SWITCH	MODERATE	0.22
BATHROOM DOES NOT HAVE PROPER VENTILATION OR DEHUMIDIFICATION	MODERATE	0.22
REFRIGERATOR IS INOPERABLE SUCH THAT IT MAY BE UNABLE TO SAFFELY AND ADEQUATELY STORE FOOD	MODERATE	0.22

Each deficiency is recorded ONCE!
5.64 points

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No to Low-Scoring REAC-UPCS Deficiencies become HIGH-scoring NSPIRE Deficiencies!



For UPCS - Trip Hazards for Common Areas and Units were NON-SCORING!
For NSPIRE - Trip Hazards for Common Areas and Units are a Moderate H&S



For UPCS - Emergency Pull cords scored approx. 0.1 per unit...even if recorded 3 times per unit.

For NSPIRE - Emergency Pull cords are a Life-Threatening H&S - but scored once PER UNIT even if cited 3 times in the same unit.

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A Little More on Call-For-Aids (emergency call buttons/strings)

The Final Scoring Notice is utterly confusing with regard to Call-For-Aids.

This could possibly be good news ...but ultimately we will just have to wait and see.

Here are the rules, page 20:

1. "Some items, such as call-for aid systems may be present in units but not currently used by the building management and have been modified or damaged by the tenant or their cat and will not be scored."
2. However, it then states, "Otherwise, call-for-aid systems that are in use by the building management will continue to be scored." This statement is on page 20 AND page 21...although the second one looks to be a duplication/error.
3. Then it goes to list Call-for-Aids in the non-scoring section!

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The Bottom Line - Call-For-Aids (emergency call buttons/strings)

Per HUD:
<p>Not Scored</p> <ol style="list-style-type: none"> 1. Carbon Monoxide Device <ol style="list-style-type: none"> a. All Defects 2. Smoke Alarm <ol style="list-style-type: none"> a. All Defects (including the new "Smoke Alarm is Obstructed" defect) 3. Call-for-Aid <ol style="list-style-type: none"> a. System is blocked, or pull cord is higher than 6 inches off the floor. <ol style="list-style-type: none"> 1. All locations

DEFICIENCY 1 - UNIT:	SYSTEM IS BLOCKED, OR PULL CORD IS HIGHER THAN 6 INCHES OFF THE FLOOR.
DEFICIENCY CRITERIA:	System is blocked. OR Pull cord end is higher than 6 inches off the floor.

ONLY Deficiency #1 is listed - looks like

DEFICIENCY 2 WILL BE SCORED!

DEFICIENCY 2 - UNIT:	SYSTEM DOES NOT FUNCTION PROPERLY.
DEFICIENCY CRITERIA:	A call-for-aid system does not emit sound or light or send a signal to the annunciator. OR The annunciator does not indicate the correct corresponding room. OR Pull cord is missing. OR Pull cord is tied up such that it cannot be engaged. SUBJECTIVE!!!

The bottom line is that if the pull cord is blocked or too short...it won't score.

If the cord is tied up IN ANY WAY (whether it's 6 inches from the floor or not) OR missing entirely...it will be scored.

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Scoring: The Good...the Bad...and the Weird

"HUD understands that it may take properties' ownership and management some time to comply with new affirmative requirements, hence, HUD will **NOT** score new affirmative requirements, which are defined as those standards that were expressly NOT in the UPCS or in any way covered by those standards, **in at least the first 12 months** of NSPIRE inspections."

- HUD lists only 5 Affirmative Requirements that will not be scored (out of 14):

WEIRD

- GFCI (not within 6 feet of water source)
- Guardrail (All defects...although only Deficiency 1 is an Affirmative Standard)
- HVAC (Deficiencies 1, 2, 7 ...they forgot to add Deficiency 9)
- Interior Lighting (Def #3 – "At least 1 permanent light fixture is not present in the kitchen and bathroom")
- At least 2 working outlets or 1 working outlet and 1 permanently installed light fixture in each room.

BAD

- What about the approx. 60 brand new NSPIRE deficiencies that were never seen in UPCS?!

GOOD

- HUD tacks on ALL deficiencies under Fire Doors also will not be scored since many of the deficiencies are new...even though it is NOT listed as an affirmative requirement

(but weird)

GOOD

- New requirements that are not scored will be flagged on the inspection report with a caret (^) symbol.

GOOD

- For at least the initial year, HUD will provide a "potential score" if the new requirements were scored and the "official score" on the inspection report.

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Random Extra Takeaways from Final Scoring Notice

- Calculated scores will be rounded to the nearest whole number with one exception: For properties that score between 59.5 and 60, the score will be rounded DOWN to 59.
- Per page 20, "Inspection scores are considered when determining whether a potential or existing HUD Multifamily business stakeholder may expand its involvement in HUD housing."
- On pages 5 and 14, HUD insists that 1 unit cannot fail an inspection.
 - I fully agree that many people misunderstood that the "30 points or more in Units" meant 30 SIZE-ADJUSTED points (you had to *divide the defect points* in Units by *how many Units were inspected*!)
 - That being said, if each Life-Threatening defect equals 2 points, then 1 or 2 "bad" units with a total of 15 LT defects between them would, in essence, fail the inspection.
- On page 7, the Notice states, "Some UPCS standards, such as overgrown vegetation, erosion, and graffiti are no longer standards." There are a few things wrong with this sentence:
 - Overgrown Vegetation and Erosion were never Standards.
 - Overgrown Vegetation was never even a deficiency under NSPIRE (except if blocking a sidewalk)
 - Erosion is still a deficiency located under Site Drainage Standard.

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MAJOR SCORING ANNOUNCEMENT (from June Standards Final Rule)

*** The Infestation, Mold-Like Substance, and Potential Lead-Based Paint Hazards – Visual Assessment Standards will include Deficiencies that **are scored at the Life-Threatening level point deduction...** despite being defined in the Severe H&S category.***

Reasoning:

- These Severe Health and Safety Deficiencies do not present risks consistent with the Life-Threatening definition, but they do present chronic health risks that are distinct from the other Severe Health and Safety Deficiencies.
- This chronic health risk category includes deficiencies that, if evident in the home or on the property, present a high risk of causing or exacerbating a chronic and severe health condition; severe health conditions include permanent disability or serious illness. This includes cases in which the harm has a likelihood of accruing irrevocably in under 24 hours and may also include risks due to longer term exposure. This category does not define an additional risk ranking or correction timeframe; it is a sub-category to be used for scoring.

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2023 Scoring Update

HUD is strongly considering allowing properties to apply for funding to satisfy the new requirements as well as potentially tying NSPIRE results to capital funding.

- ✓ For PHAs - Google PIH 2023-10 - \$250K per Federal Fiscal Year
 - Includes Carbon Monoxide and Smoke Alarms/Detectors
 - And so much more!

There are a lot of new NSPIRE deficiencies that could result in high capital expenditures

- ✓ For instance, if your property has 2-prong outlets and you want to run a ground wire in to upgrade the 2-prongs to a 3-prong, that could get very expensive.

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Deficiencies that will NOT be scored "for the foreseeable future" (per Final Scoring Rule)

ALL 3 INSPECTABLE AREAS

1. Carbon Monoxide Alarms – all defects – indicated on report by a + sign
2. Smoke Alarms – all defects – indicated on the report by a * sign
3. Call-For-Aid – Deficiency #1 (System is blocked or pull cord is higher than 6 inches from the floor)
4. Handrail
 - a. Handrail is missing
 - b. Handrail is not installed where required

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Deficiencies that will NOT be scored UNTIL OCTOBER 1, 2024 (per Final Scoring Rule)

For BOTH PHA and Multifamily Programs – all of the following will be indicated on the report by a caret ^ symbol

1. Fire Doors
 - a. All defects
 - b. All locations
2. Electrical – GFCI
 - a. Deficiency 3 – An unprotected outlet is present within six feet of a water source
 - b. All locations
3. Guardrail
 - a. All defects
 - b. All locations
4. HVAC
 - a. Between Oct 1 and March 31 – heater works but interior temp is 64 to 67.9°F – All locations
 - b. Between Oct 1 and March 31 – heater works or doesn't work – temp inside below 64°F – All locations
 - c. Between April 1 and Sept 30 – heater is damaged, inoperable, missing or not installed – All locations
5. Interior Lighting
 - a. At least 1 permanently installed light fixture is not present in the kitchen and bathroom – All locations
6. Minimum Electrical and Lighting
 - a. At least 2 working outlets are not present within each habitable room OR 1 working outlet and 1 permanently installed light fixture is not present within each habitable room.

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A-B-C's

90a*

a	No Health and Safeties at all
b	Regular H&S – no Exigent H&S
c	Exigent H&S were recorded
*	Only refers to Smoke Alarms/Detectors

CARBON MONOXIDE SYMBOL = +

Deficiencies that are not scored the first year = ^ (caret symbol)

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Minimum Unit Sample Size Reference Chart				Units in Property	NSPIRE Sample	Units in Property	NSPIRE Sample
Units on the Property	Minimum Unit Sample Size	Units on the Property	Minimum Sample				
1	1	26 - 29	14	1	1	28-30	16
2	2	30 - 34	15	2	2	31-35	17
3	3	35 - 40	16	3	3	36-39	18
4	4	41 - 47	17	4	4	40-45	19
5 - 6	5	48 - 56	18	5	5	46-51	20
7	6	57 - 67	19	6	6	52-59	21
8 - 9	7	68 - 81	20	7	7	60-67	22
10 - 11	8	82 - 101	21	8	8	68-78	23
12 - 13	9	102 - 130	22	9	9	79-92	24
14 - 16	10	131 - 175	23	10	10	93-110	25
17 - 18	11	176 - 257	24	11-12	11	111-120	26
19 - 21	12	258 - 449	25	13-14	12	121-166	27
22 - 25	13	450 - 1461	26	15-16	13	167-214	28
1462 - 9999	27			17-18	14	215-295	29
				19-21	15	296-455	30
				22-24	16	456-920	31
				25-27	17	921+	32

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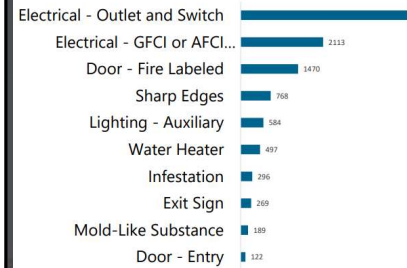
NSPIRE Deficiency Rationales

- ❖ All deficiencies must tie back to a rationale
- ❖ Rationales are clear and concise explanations of the potential risk a defect presents
- ❖ 2 Types of Rationales
 1. Direct Rationale
 - If the deficiency were no longer present, the risk would be resolved
 2. Indirect Rationale
 - If the deficiency were no longer present, and other contributory factors remained, the risk would be substantially reduced or mitigated, but would remain present
 - The “other contributory factors” include Environmental or structural variables and exposure to vulnerable populations

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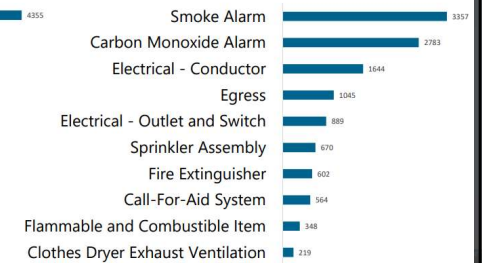
24 Hour Repair

Top 10 Most Occurring Severe Defects



24 Hour Repair

Top 10 Most Occurring Life Threatening Defects



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NSPIRE STANDARDS (v 3.0 FINAL)

Breakdown

- There are 63 NSPIRE Standards posted on HUD's site
 - ✓ This does not mean they just added 1 (Version 2.2 had 62 Standards). MANY things were changed:
 1. Added new deficiencies
 2. Removed, relocated or consolidated deficiencies
 3. Adding, removing or renaming many Standards
- Within these Standards are multiple different types of deficiencies.

	UPCS TOTAL	NSPIRE TOTAL
Total Deficiencies	140	200 (conservative – accounts for same defect in multiple areas)
UPCS Exigent H&S (24-hour repair) VS NSPIRE LT and Severe (24-hour repair)	16	76 – Unit 103 – Inside 38 - Outside
Regular UPCS H&S (no repair req) VS NSPIRE Moderate H&S (30-day repair)	12	79 – Unit 82 – Inside 43 - Outside
NON-H&S UPCS VS NSPIRE Low H&S (60-day repair)	112	8 – Unit 18 – Inside 7 - Outside

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HUD-NSPIRE

UNIT

Version	Inspectable Item	Deficiency	Low	Moderate	Severe	LT
V3.0	Bathtub and Shower	Only 1 bathtub or shower is present and it is inoperable or does not drain.			X	
V3.0	Bathtub and Shower	A bathtub or shower is inoperable or does not drain and at least 1 bathtub or shower is present elsewhere that is operational.		X		
V3.0	Bathtub and Shower	Bathtub component or shower component is damaged, inoperable, or missing such that it may limit the resident's ability to maintain personal hygiene.		X		
V3.0	Bathtub and Shower	Bathtub component or shower component is damaged, inoperable, or missing and it does not limit the resident's ability to maintain personal hygiene.	X			
V3.0	Bathtub and Shower	Bathtub or shower cannot be used in private		X		
V3.0	Cabinet and Storage	Food storage space is not present		X		
V3.0	Cabinet and Storage	50% or more storage component is damaged, inoperable, or missing		X		
V3.0	Call-For-Aid System	System is blocked, or pull cord is higher than 6 inches off the floor. *Not Scored				X
V3.0	Call-For-Aid System	System does not emit sound, light, send a signal to the annunciator, annunciator does not indicate the correct corresponding room, cord is missing or tied up such that it cannot be engaged.				X
V3.0	Carbon Monoxide Alarm	Carbon monoxide alarm is missing, not installed, or not installed in a proper location. *Not scored				X

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Current UPCS Deficiencies that are **NOT** in NSPIRE's Standards...(yet)

1. Non-Security Fence Deficiencies
2. Overgrown/Penetrating vegetation – unless it forces you off a walkway
3. Playground Deficiencies
4. Mailbox Deficiencies
5. Swimming Pool Deficiencies
6. Spalling/Cracking in Parking Lots and Walkways
7. Generator Run Up Records
8. Litter/Garbage/Debris in Units
9. Hazards/Other category – discussing adding this back in
10. Building built **AFTER** 1978 – no peeling paint deficiencies Inside or Units – must be over 10 square feet on the Outside to be recorded for properties built **AFTER** 1978
11. Inside and Unit wall trim (baseboard) damage
12. Exterior caulking damaged/missing
13. Outlet/Switch cover plates cracked with no exposed conductors
14. Flooring (hard floor or carpet) stains or peeling paint
15. Surface rust/corrosion on water heaters
16. Graffiti
17. Dual-pane windows with condensation between the panes (aka blown seal)
18. Dishwashers/Garbage Disposals – unless leaking or exposing wires
19. Screen/Storm/Security Doors

Key Takeaways: Final Rule – Administrative Procedures

1. Up to 5 additional units could be inspected if recommended by a resident council or tenant organization.
 - These 5 units will **NOT** be scored (unless one of them is already part of the NSPIRE sample)
 - Residents must submit unit recommendations through the automated system or email at least 30 days prior to the scheduled inspection. (HUD will allegedly inform residents when they can submit their recommendations approximately 180 days prior to inspection).
 - Even though not scored, all deficiencies must be corrected and evidence of correction for the 24-hour deficiencies must be communicated to HUD.
2. The inspection **COULD INCLUDE VACANT UNITS** – REAC is seeking comment on this practice and will consider it for NSPIRE inspector protocols.
 - I highly recommend you email HUD at NSPIRERegulations@hud.gov and convey your opinion on this.
3. PHAs and POAs are required to make inspection results available to residents.
4. HUD suggests notifying your residents at least 7 days in advance through multiple communication methods.

Administrative Procedures Final Rule (cont) Yellow = Different than UPCS

Inspectors will NOT inspect or cite as deficient:

1. Areas of the property that are not considered housing or part of the housing project (**commercial space**, sidewalks, **fencing**, roads and parking lots not owned or maintained by the property).
2. **Peeling paint in areas a child under age 6 would not frequent (e.g., locked utility closet)**
 - If you are exempt (elderly, persons with disabilities, or zero-bedroom dwelling unless a child of less than 6 years old resides in such housing) **you must upload evidence of the exemption to the NSPIRE system.**
 - There is **NOTHING** in writing instructing the inspector not to record peeling paint if the property is exempt (other than in places a child under 6 will not go) nor is there anything in writing that you will get your points back if it's recorded on an exempt property or unit without a child under 6.
3. Tenant-owned personal property that are NOT considered components of the 3 inspectable areas: Unit, Inside, Outside (e.g., tenant-owned picture with broken glass would not be cited for sharp edges).

Certain tenant-owned items WILL be cited:

1. Any items affecting the performance of a fire safety system or puts the building at risk (e.g., tenants painting or blocking sprinkler heads)
2. Damaged/missing tenant-owned appliances where it is considered **the primary item** to meet affirmative requirements (e.g., tenant-owned refrigerator has a damaged seal)
3. **Anything tenant-owned that violates affirmative requirements (e.g., unvented fuel-burning appliance)**

HUD PUBLISHES INSPECTION STANDARD FINAL NOTICE v3.0 HERE IS THE GOOD NEWS!

1. Under the Window Standard – “Condensation that is present due to a failed window seal should not be evaluated”
2. Under Egress Standard (3rd floor and lower)
 - ✓ “Resident-owned property should NOT be evaluated as an obstruction to the rescue opening or to the fire escape access
*Don't get too excited – “A permanently installed window-mounted air conditioner” is still an obstruction
 - ✓ Only bedroom windows are considered Rescue Openings – NOT living room windows (unless there is as fire escape)
3. Tenant-owned Fire Extinguishers and extinguishers not in service (in storage) will NOT be inspectable
4. A missing lightbulb from a fixture will NOT be recorded as an exposed Electrical Conductor, however the following still is:
 - a. Hardwired smoke alarm with an exposed conductor
 - b. Lighting fixtures
 - c. Wiring that is insulated but not protected by sheathing or conduit
 - d. Visible wire nuts on electrical conductors
 - e. Wall-mounted light fixture with a damaged or missing cover
 - f. Device cover plates missing/damaged
 - g. GFCI/AFCI test or reset button missing
 - h. NOW THE GAP MUST BE GREATER THAN ½ INCH!!!

GOOD NEWS (Continued)

5. Under the new deficiency #5 for Electrical – Conductor, Outlet and Switch: “Water is currently in contact with an electrical conductor,” HUD clarified:
 - a. ONLY active leaks are to be cited (confirmed visually)
 - b. Leaks near a component confirmed to be waterproof would NOT be cited
6. Under the Sprinkler Assembly Standard
 - a. Paint or foreign material (like dust) must cover 75% or more of the sprinkler assembly or 75% or more of the glass bulb to be cited
 - b. Corrosion was added as a new deficiency
7. The Graffiti Standard has been **REMOVED!**
8. Handrails has a new deficiency #4 “No handrail is present and there is no evidence of previous installation.”
 - a. Listed as N/A H&S Classification under Unit
 - b. The Final Rule states, “This deficiency will not be scored and there is no requirement for a correction,”
 - c. It IS listed as a “Low” H&S for Inside and Outside areas...thus will be scored (unless HUD manually turns off the scoring on their end somehow).
6. Under Mold-Like Substance Standard, the “Presence of mold-like substances at very low levels” (under 4 sq inches) has been removed.
7. NIS will not be a “designation” in NSPIRE... it has to be a poor repair on an inspectable item within NSPIRE. If paint is mismatched...paint (other than peeling paint on pre-1978 properties) is not a citable defect under NSPIRE.

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THE NOT SO GOOD NEWS

1. ALL Outside electrical outlets must be GFCI-protected (see Electrical – GFCI or AFCI – Outlet or Breaker Standard)
 - a. Remember this is an affirmative Standard – not scored the first year
 - b. Don’t forget...they have to meet code – be weather resistant and have an in-use cover!
2. Guardrails have been made a new Affirmative Habitability Requirement if the vertical distance measures more than 30 inches above the “floor or grade below.”
 - a. Under More Information it states, “This deficiency should **only be evaluated in areas that are accessible to the resident.**”
 - b. This could potentially be a costly impact on many properties without guardrails on their retaining walls, for example.
 - c. Local code exceptions could also possibly be honored.
3. Window screens have been specifically called out under Deficiency #4 of the Window Standards to be a Moderate H&S if they are damaged or missing (if there is evidence they were previously installed).
4. Structural System Standard deficiency, “Structural system exhibits signs of serious failure.”
 - a. HUD states in the Rule that, “NSPIRE Inspectors will not be making structural stability assessments...”
 - b. Inspectors absolutely **WILL** be doing just that with this deficiency still in the standards!
5. Unbelievably, HUD will require that “permanent heating sources” be tested no matter what time of year it is.
6. The Infestation Standard is a complete and total disaster (next slide)

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Infestation Standard Issues

TITLE:	INFESTATION		
VERSION:	V3.0		
DATE PUBLISHED:	06/20/23		

DEFINITION:	The presence of animals with potential impacts on resident health and safety.		
PURPOSE:	None		
COMMON COMPONENTS:	None		
LOCATION:	<input checked="" type="checkbox"/>	Unit	Kitchen, cabinet, refrigerator, cooking appliance, bathroom, furniture, bed, carpet, drapes (Note that this is not an exhaustive list).
	<input checked="" type="checkbox"/>	Inside	Kitchen, cabinet, refrigerator, cooking appliance, bathroom, furniture, carpet, drapes (Note that this is not an exhaustive list).
	<input checked="" type="checkbox"/>	Outside	Near refuse enclosure or anywhere garbage is present, eaves of roofing (Note that this is not an exhaustive list).

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Infestation Standard Issues (Continued)

DEFICIENCY 2 – UNIT: EXTENSIVE COCKROACH INFESTATION.	Unit 105 – 1 live roach in the kitchen
Sighting of at least one live cockroach in two or more Units during a daytime surface visual assessment.	Unit 108 – 1 live roach in the bathroom
OR	
Sighting of at least one live cockroach in two or more rooms in a Unit during a daytime surface visual assessment.	
UNIT 108 AND ALL SUBSEQUENT UNITS WITH AT LEAST 1 LIVE ROACH RECORD AS EXTENSIVE INFESTATION!!!	
DEFICIENCY 4 – UNIT: EXTENSIVE BEDBUG INFESTATION.	HEALTH AND SAFETY DETERMINATION: Severe
Sighting of at least one live bedbug in two or more Units during a daytime surface visual assessment.	
OR	
Sighting of at least one live bedbug in two or more rooms in a Unit during a daytime surface visual assessment.	
DEFICIENCY 6 – UNIT: EXTENSIVE MOUSE INFESTATION.	CORRECTION TIMEFRAME: 24 hours
Sighting of at least one live mouse in two or more Units during a daytime surface visual assessment.	HCV PASS / FAIL: Fail
OR	HCV CORRECTION TIMEFRAME: 30 days
Sighting of at least one live mouse in two or more rooms in a Unit during a daytime surface visual assessment.	

*** The Infestation, Mold Like Substance, and Potential LSP – Visual Assessment Standards will include Deficiencies that are scored at the 100 Threatening level point deduction ... despite being defined in the Severe H&S category.***

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Infestation Standard...the only good news

Page 15 in the NSPIRE Final Rule – Inspection Standards states the following:

“Within the correction timeframe, documentation must be provided for the pest management plan, and this documentation must include:

1. Start date of the plan
2. Servicing schedule
3. Methods of pest monitoring
4. Managing and treatment
5. And other factors as determined by HUD, the PHA and/or other relevant authority

Integrated Pest Management (IPM) is strongly encouraged – this uses prevention-based pest management methods with a focus on:

1. Identifying and correcting building conditions that contribute to infestation
2. Reducing use of pesticides (especially routine or untargeted pesticide application)
3. Modification of hygiene and sanitation practices in and on the property
4. Assessment and on-going monitoring to assure appropriate interventions as needed.”

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How Often Inspections Occur

Timing of the inspection depends on your NSPIRE score

- 90+ = 3-year break
- 80-89 = 2-year break
- 79 ↓ = 1-year break

90-100
Property inspected every 3 years

80-89
Property inspected every 2 years

79 and below
Property inspected every year

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Constructive Forensics

Exceptions to the 3-2-1 Rule

- **Small Rural Public Housing Agencies (PHAs)**
 - ✓ 550 or fewer combined public housing units and vouchers under section 8 **AND** either of the following:
 - Has a primary administrative building with a physical address in a rural area, OR
 - More than 50% of its combined PH and Voucher units are in rural areas
- HUD will make the initial determination of PHAs that qualify as small rural no later than October 30, 2023 and every 3 years thereafter. You can also appeal HUD's decision.
- Shall be assessed and scored based only on the physical condition of their public housing properties
- Will be inspected no more than once every 3 years, unless designated as “troubled” which is defined as:
 - ✓ The weighted average score of all inspections is below 70% of the total available points, OR
 - ✓ Weighted average score between 70-80% of the total available points and has at least one property that receives fewer than 70% of the total available points
- Troubled PHA properties, regardless of size, will be inspected annually based on fiscal year (FY) end

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Failing Scores – Multifamily Housing Programs

Multifamily Housing Programs
*Refer to Housing Notice 2018-08

31 – 59: Issued a NOV and/or a NOD (Notice of Violation / Notice of Default)

1. Conduct a 100% survey of the entire project
2. Correct all deficiencies at the property, including those identified in the REAC inspection report and the owner's survey; and
3. Submit to their Account Executive (AE) a copy of the owner's survey and a form certification that all deficiencies have been corrected.

0 - 30: Automatically referred to the DEC (Departmental Enforcement Center)

31 – 59 (**2 years in a row**) – Discretionary referrals to the DEC.
HUD will take other review actions before referring to the DEC.

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Constructive Forensics

Failing Scores – Public Housing

PHA's

0 – 30: The DEC will evaluate the PHA's correction of LT and Severe deficiencies.
If the PHA is not responsive or does not correct these deficiencies, the PHA may be referred to the Assistant Secretary for Public and Indian Housing for sanctions or other actions.

31 – 59: PIH will retain some discretionary review of the PHA before or in place of a referral to the DEC.
This review will consider the PHA's rating under the Public Housing Assessment System (PHAS) and whether there are other administrative tools such as a Corrective Action Plan or PHAS Recovery Agreement that includes the property.

Appeals – per 2 Final Rules

Only 1 type of appeal now – Technical Review

The clock starts the day you receive your inspection report – you have **45 days!!!**

- ✓ You must submit the appeal electronically in the online NSPIRE system
- ✓ Copy NSPIRERegulations@hud.gov
- ✓ And send a courtesy copy to your HUD field office representative

Reasons you can appeal:

1. HUD or inspector error
2. Adverse conditions beyond your control
3. Modernization work in progress
4. Conflicts with state or local code.



Appeals – per 2 Final Rules (con't)

HUD will only accept and process appeals that have the potential to either:

- Increase your score from a fail to above a 60
- Increase your score so that it changes your inspection frequency

The evidence provided in the appeal must be objectively verifiable such as:

- ✓ Photographic evidence
- ✓ Written material from an objective source with subject matter expertise that pertains to the item being reviewed.
- ✓ Protocol from the NSPIRE Standard states to not cite the deficiency or to cite it in a different way.

Appeals will not be accepted for conditions that were repaired AFTER the inspection.

Appeals – per 2 Final Rules (con't)

Material Errors

1. Building data error
 - The inspector inspected the wrong building
 - The inspector inspected a building that was not owned by the property (including common or site areas)
 - Incorrect data to the failure of an owner or PHA to ensure HUD's systems of records are updated CANNOT be appealed.
 - Address and/or building names will not be considered as a material error.
2. Unit count error
 - This error occurs if the total number of units considered in scoring is incorrect due to the fault of HUD.
3. Non-Existent deficiency error
 - If the inspection records and observed deficiency that does not satisfy or does not meet a reasonable interpretation of the definition of that deficiency as defined by inspection procedures.

Appeals – per 2 Final Rules (con't)

4. Adjustments for factors not reflected or inappropriately reflected in the physical condition score.
 - HUD might review the property's results if facts and circumstances affecting the property are not reflected or are reflected inappropriately in the inspection.
 - Inconsistencies between local code requirements and the HUD physical inspection protocol
 - Conditions that are permitted by local variance or license
 - Preexisting physical features that do not conform to, or are inconsistent with, HUD's physical condition protocol.
 - The project being scored for elements that it does not own and is not responsible for maintaining.

Adverse conditions beyond the control of the owner of PHA

- Damage caused by third parties such as a private entity or public entity undertaking work near the property resulting in damage.
- Natural disasters

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Appeals – per 2 Final Rules (con't)

Modernization work in progress

- Only the units that are currently undergoing modernization will have their scores adjusted!

****Make this a non-issue!** Request an inspection extension and send to your local HUD office the following:

1. Scope of work (including the start/end dates)
2. Substantial rehab is \$18,392/unit
Total Cost of Rehab ÷ Number of Units = Total Cost Per Unit
3. Get the approval for the extension BEFORE the inspector contacts you!

What can happen as a result of a successful appeal?

- A new inspection will be ordered (this will only occur if there are significant anomalies/errors)
- Correction of the original inspection
- Issue a new physical inspection score

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Appeals – per 2 Final Rules (last slide)

When will HUD notify the property of the final decision?

- Within 90 days
- Up to 120 days for the first year of NSPIRE implementation

PHAs or POAs that do not hear from REAC on the status of their appeal within 120 days will have all the points relating to appealed deficiencies restored!



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Fire Safety

NSPIRE “improves” fire safety standards in several ways from UPCS

Implementation of National Fire Protection Association (NFPA) 72 (Smoke Alarms/Detectors)

New fire sprinkler defects related to the proper functioning of these systems

Minimum temperature requirement (68°)

GFCIs, AFCIs, CO alarms, dryer exhaust, and electrical outlets

Permanent heating source requirement

More stringent & specific fire door requirements

Prohibition of fuel-burning unvented space heaters

STANDARDS

Carbon Monoxide Alarm
Smoke Alarm
Trash Chute
Sprinkler Assembly
Exit Sign
Fire Escape

Egress
Fire Extinguisher
Flammable & Combustible Item
Clothes Dryer Exhaust Ventilation
Door – Fire Labeled



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Carbon Monoxide Standard

DEFICIENCY 1: Carbon monoxide alarm is missing, not installed, or not installed in a proper location.
LOCATION: Unit — Affirmative Habitability Requirement

DEFICIENCY 2: Carbon monoxide alarm is obstructed.
LOCATION: Unit Inside

DEFICIENCY 3: Carbon monoxide alarm does not produce an audio or visual alarm when tested.
LOCATION: Unit Inside

MORE INFORMATION: - A combination smoke and carbon monoxide alarm should be evaluated under both the Carbon Monoxide Alarm and Smoke Alarm standards.

NOT SCORED!!



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Carbon Monoxides

Carbon Monoxide Detectors

They made the Carbon Monoxide deficiency criteria much less restrictive

- Added that "This is not a replacement for a code inspection. All requirements of the [IFC Section 915](#) and [IFC Section 1103](#) must be met even though only the criteria listed herein will be inspected during a NSPIRE inspection
- Multiple scenarios are posted under this Standard that should answer many of your questions

MOST IMPORTANT CHANGE

- If a fuel-burning appliance, fuel-burning fireplace, or adjacent space from which byproducts of combustion gases can flow is present, then verify that a carbon monoxide alarm is installed within each sleeping area and in the immediate vicinity of each sleeping area.

Version 2.2

- If a fuel-burning appliance, fuel-burning fireplace, or adjacent space from which byproducts of combustion gases can flow is present, then verify that a carbon monoxide alarm is installed within each bedroom or in the immediate vicinity of each bedroom.

Version 3.0

72

- **EXEMPTED FROM CO RULE** (although urged by HUD to take action)
 - a. HUD-insured housing not subject to an assistance contract
 - b. ESG, CoC, HOME, and HTF programs
 - c. Section 202 direct loan program before 10/1/1991 (inc. 202/8 and 202/162 projects)
 - d. Housing with mortgages insured OR held by HUD receiving assistance from HUD under the following authorities:
 - 1) Section 207 (Rental Housing Insurance)
 - 2) Section 213 (Cooperative Housing Insurance)
 - 3) Section 220 (Rehab and Neighborhood Conservation Housing Insurance)
 - 4) Sections 221(d) (3-5) (MIR, BMIR or Hsg for Moderate Income and Displaced Families)
 - 5) Section 231 (Housing for Elderly Persons)
 - 6) Section 232 (Nursing Homes, ICF, ALF, Board and Care Homes)
 - 7) Section 234(d) (Condominiums)
 - 8) Section 236 (Rental/Cooperative Housing for Lower Income Families)
 - 9) Section 241 (Supplemental Loans for MF Projects)
 - 10) Section 542(c) (HFA's – Housing Finance Agency Risk Sharing Program)

73

2 brands of CO detectors are failing to alert users of presence of deadly gas, officials warn

Share   

KCRA 

Updated: 9:28 AM PDT Mar 16, 2023

The U.S. Consumer Product Safety Commission (CPSC) has reported that digital display carbon monoxide detectors produced by GLBSUNION and CUZMAK could put your life in danger.

According to the CPSC's release, sensitivity tests were conducted on the two brands of detectors, with both failing to alert when exposed to pre-determined concentrations of carbon monoxide (400 ppm).

The detectors were being sold on Amazon.com for between \$16 and \$40. They both are made of white plastic, feature a digital display and have approximate dimensions of 4-by-1.5-by-4 inches.

Model No. AJ-938 was sold under the Amazon ASIN B093Y1KK5Q and B093Y637CM; and Model No. CD01 was sold under the Amazon ASIN B07MPVK6HG and B07K44HLCV.

74

Smoke Alarms/Detectors

Detects smoke AND sounds an alarm



SMOKE ALARM

SMOKE DETECTOR

Detects smoke and sends a signal to the fire alarm system to activate and audible/visual alarm

81

NSPIRE will require smoke alarms/detectors in the following locations (per NFPA 72):

1. On each living level
2. Outside bedrooms (within 21 ft of any bedroom door)
3. Inside bedrooms

****Should be installed at least 10 ft from cooking appliances****

****If there is a door separating the living room from the bedroom hallways – a smoke alarm must also be in the living room****

****Should NOT be installed near windows, doors or ducts where drafts might interfere****

Expected to be enforced on **December 29, 2024**, all HUD-assisted housing will be following NFPA 72 Chapter 29 and requiring **ONE** of the following types of smoke alarms/detectors for your properties:

- ✓ Hard-wired (or wireless interconnected)
- ✓ Battery only (not hard-wired or wireless interconnected)
- ✓ Combination smoke and carbon monoxide alarms
- ✓ For hearing impaired
 - a. Alarms with strobe lights
 - b. Vibration notification appliances such as pillow or bed shakers which are activated by the sound of a smoke alarm. This was not mentioned by HUD yet, however the NFPA does require them.

- Tamper-Resistant -
- ❖ Battery must be SEALED
- ❖ 10-year Non-rechargeable
- ❖ Contain a way to hush/silence

**** Check with your local code agency (Authority Having Jurisdiction (AHJ)) and/or your insurance company as to whether you are required to have hard-wired or wireless interconnected smoke alarms****

82

Smoke Alarm Standard

DEFICIENCY 1: Smoke alarm is not installed where required.

LOCATION: Unit – Affirmative Habitability Requirement Inside – Affirmative Habitability Requirement

More Information: - A smoke alarm installed within a hallway in the immediate vicinity of multiple bedrooms meets the requirement of "outside the bedroom(s)" under this standard.
 - A smoke alarm installed outside a bedroom may meet the requirement of "on each level" under this standard.
 - If a smoke alarm is missing (i.e., evidence of prior presence, but now not present or is incomplete) from a non-required area, then it should not be evaluated under this standard.
 - If another hazard is present, then it should be evaluated under the respective standard (e.g., an exposed conductor should be evaluated under the Electric Conductor, Outlet, and Switch standard).

DEFICIENCY 1 – INSIDE: SMOKE ALARM IS NOT INSTALLED WHERE REQUIRED.

DEFICIENCY CRITERIA: Smoke alarm is not installed inside each classroom.
 AND
 Smoke alarm is not installed outside the classroom(s).
 AND
 Smoke alarm is not installed on each level.

MORE INFORMATION: - A combination smoke and carbon monoxide alarm should be evaluated under both the Carbon Monoxide Alarm and Smoke Alarm standards.

NOT SCORED!!!



83

Smoke Alarm Standard

DEFICIENCY 2: Smoke alarm is obstructed.

LOCATION: Unit Inside

DEFICIENCY 3: Smoke alarm does not produce an audio or visual alarm when tested.

LOCATION: Unit Inside



84

Trash Chute Standard

DEFICIENCY 1: Chute door does not open or self-close and latch.

LOCATION: Inside

COMMON COMPONENTS: Chute; Door; Latch; Compactor; Chute discharge fire door with fusible link; Wash valve; Spray head; Springs; Handle; Counterbalance

Moderate H&S – 30 days

85

New Fire Sprinkler Deficiencies

DEFICIENCY 1: Sprinkler head assembly is encased or obstructed by an item or object that is within 18 inches of the sprinkler head.

LOCATION: Unit Inside Outside

DEFICIENCY 2: Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance.

LOCATION: Unit Inside Outside

DEFICIENCY 3: Sprinkler assembly has evidence of corrosion.

LOCATION: Unit Inside Outside

DEFICIENCY 4: Sprinkler assembly has evidence of foreign material that is detrimental to performance.

LOCATION: Unit Inside Outside



MORE INFORMATION: If a leak is present, evaluate the deficiency under the Leak – Water standard.

88

Sprinkler Assembly Standard

DEFICIENCY 1: Sprinkler head assembly is encased or obstructed by an item or object that is within 18 inches of the sprinkler head.

LOCATION: Unit Inside Outside

LT H&S – 24 hours

MORE INFORMATION: - Some sprinkler heads may not have 18" clearance due to features within the built environment (e.g., closet, wall mounted kitchen cabinets, permanently installed light fixture, exit sign) and should not be considered a deficiency under this Standard.

- Determine if items have been stored or stacked around the sprinkler head or if alterations have been made that impede the sprinkler head assembly.

- A parked vehicle within 18" of the sprinkler assembly should not be considered a deficiency under this Standard.

- Examples of encasements may include, but are not limited to:

- Painter's tape
- Plastic bag

- Examples of obstructions may include, but are not limited to:

- Furniture
- Shelves
- Stacked materials

89

Sprinkler Assembly Standard

DEFICIENCY 2: Sprinkler assembly component is damaged, inoperable, or missing and it is detrimental to performance.

LOCATION: Unit Inside Outside

LT H&S – 24 hours

More Information: - For the purpose of this Standard, a condition is detrimental to performance if it impacts the sprinkler assembly's ability to properly or adequately discharge when activated.

- Examples of conditions that may be detrimental to performance may include, but are not limited to:

- Physical damage
- Glass bulb has lost fluid
- Concealed sprinkler cover plate is caulked or glued to ceiling
- Missing sprinkler head escutcheon

90

Sprinkler Assembly Standard

DEFICIENCY 3: Sprinkler assembly has evidence of corrosion.

LT H&S – 24 hours

LOCATION: Unit Inside Outside

INSPECTION PROCESS:

- OBSERVATION: - Look at the sprinkler assembly and its components to identify any evidence of corrosion.
- REQUEST FOR HELP: - None
- ACTION: - None
- More Information: - None

← ZERO GUIDANCE!

HUD stated that this deficiency is the most important of all 4 sprinkler assembly deficiencies because roughly 12% of malfunctioning sprinkler heads are caused by some kind of corrosion.

AS IT STANDS NOW – CORROSION ANYWHERE ON THE SPRINKLER HEAD ASSEMBLY (including escutcheons) WILL BE CITED!!!!

Sprinkler Assembly Standard

DEFICIENCY 4: Sprinkler assembly has evidence of foreign material that is detrimental to performance.

LT H&S – 24 hours

LOCATION: Unit Inside Outside

- ACTION: - If foreign material is present, determine if it covers 75% or more of the sprinkler assembly or 75% or more of the glass bulb.
- More Information: - For the purpose of this Standard, a condition is detrimental to performance if it impacts the sprinkler assembly's ability to properly or adequately discharge when activated.
 - Examples of foreign material that may be detrimental to performance may include, but are not limited to:
 - Loading / dust
 - Paint

Exit Sign Standard

DEFICIENCY 1: Exit sign is damaged, missing, obstructed, or not adequately illuminated.

LT H&S – 24 hours

LOCATION: Inside Outside

- If present, visually inspect to identify any damage or evidence that indicates an exit sign was previously installed but is now not present or is incomplete.
- Some AC-powered signs may have unutilized test buttons and some back-up batteries may be remotely located.
- If the back-up battery is remotely located, the POA may direct the inspector to the remote location and demonstrate its functionality.
- Combination auxiliary light and exit sign devices must be recorded as two individual deficiencies, each within its respective inspectable item.

Fire Escape Standard

DEFICIENCY 1: Fire escape component is damaged or missing.

LT H&S – 24 hours

LOCATION: Outside

DEFINITION: An apparatus on the outside of a building used for escaping from a building on fire.

MORE INFORMATION: A blocked fire escape should be evaluated under the Egress standard.

- If a window or door leading to the fire escape is blocked, refer to the Egress standard.
- If the fire escape itself is blocked, refer to the Egress standard.
- There is no requirement for inspectors to go on the fire escape as this is a visual observation from the ground or unit.


Egress Standard

DEFINITION: A safe, continuous, and unobstructed path of travel from any point in the building, unit, or structure to the public way.

DEFICIENCY 1: Obstructed means of egress.
LOCATION: Unit Inside Outside

DEFICIENCY 2: Sleeping room is located on the 3rd floor or below and has an obstructed rescue opening.
LOCATION: Unit

DEFICIENCY 3: Fire escape access is obstructed.
LOCATION: Unit



99

Egress Standard

DEFICIENCY 1: Obstructed means of egress.
LOCATION: Unit Inside

LT H&S – 24 hours

DEFICIENCY CRITERIA: The exit access or exit is obstructed.

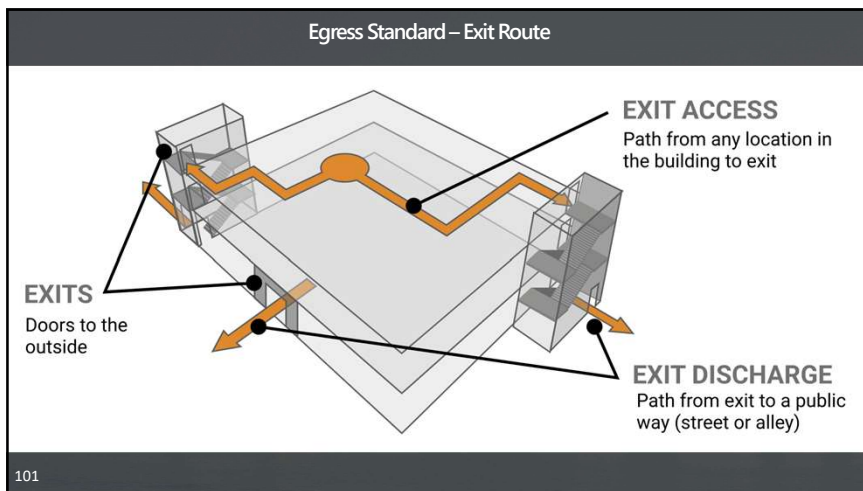
- The following are examples of conditions on doors that may obstruct means of egress:

- Double key cylinder deadbolt locks or any lock that requires a key, a tool, or special knowledge or effort to operate (from the egress side) are not allowed on any door that serves as an exit or any door along the exit access.
- Double key cylinder lock on a bedroom door.
- When fixed security bars are present that cover a door that is the designated means of egress from the building.
- Any lock on movable security bars for doors requiring a key (special tool) to open, whether locked or unlocked at the time of inspection.
- Placement of an item or furniture that obstructs a means of egress.

Deficiency 1 pertains ONLY to:

- ❖ Doors
- ❖ Pathway to the doors!!!

100



Egress Standard

DEFICIENCY 1 – OUTSIDE: OBSTRUCTED MEANS OF EGRESS. LT H&S – 24 hours

DEFICIENCY CRITERIA: The exit discharge is obstructed.

MORE INFORMATION:

- An exit discharge is a path from an exit to a public way.
- A keyed exterior gate or fence is considered a condition that may obstruct the means of egress.
- If an item located on the outside is obstructing access to the fire escape, then evaluate under this deficiency.

103

Egress Standard

DEFICIENCY 2: Sleeping room is located on the 3rd floor or below and has an obstructed rescue opening.

LOCATION: ☒ Unit

LT H&S – 24 hours

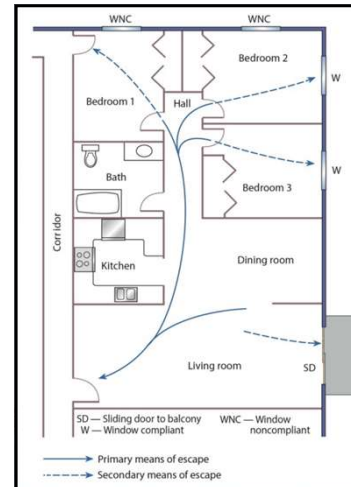
MORE INFORMATION: - If there is a fire escape adjacent to the rescue opening, then evaluate under Deficiency 3.

- Resident-owned property should **not** be evaluated as an obstruction to the rescue opening.

- The following are examples of conditions that may obstruct a rescue opening:

- Window locks that require a key, a tool, or special knowledge or effort to operate (from the interior).
- When fixed security bars are present that cover a window that is the designated rescue opening from the building.
- Any lock on movable security bars for windows requiring a key (special tool) to open, whether locked or unlocked at the time of inspection.
- Placement of an item or furniture that is not resident owned and obstructs a rescue opening.
- A permanently installed window-mounted air conditioner.

104



NFPA GUIDELINES

LIVING ROOM WINDOWS = NOT CONSIDERED FOR EGRESS UNLESS THE ACCESS POINT FOR FIRE ESCAPES

LIVING ROOM **DOORS** ARE ABSOLUTELY EVALUATED FOR EGRESS – THEY ARE CONSIDERED AN “EXIT”

WINDOW EGRESS DIMENSIONS PER FIRE CODE!

1. The window **MUST** open a minimum width of 20 inches
2. The window **MUST** open a minimum height of 24 inches
3. The clear opening **MUST** add up to 5.7 sq ft (except for grade windows which can be 5 sq ft)
4. The windowsill cannot be more than 44 inches off the floor

$$20 \text{ in} \times 41 \text{ in} = 820 \text{ in}$$

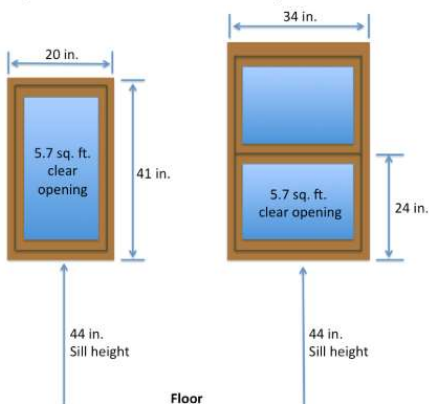
$$820 \text{ in} \div 144 = 5 \text{ ft. } 7 \text{ in}$$

$$24 \text{ in} \times 34 \text{ in} = 816 \text{ in}$$

$$816 \text{ in} \div 144 = 5 \text{ ft. } 7 \text{ in}$$

106

Egress Code: Minimum Size Requirements



Egress Standard

DEFICIENCY 3: Fire escape access is obstructed.

LOCATION: ☒ Unit

LT H&S – 24 hours

MORE INFORMATION: - Resident-owned property should **not** be evaluated as an obstruction to the fire escape access.

- The following are examples of conditions on windows that may obstruct fire escape access:

- Window locks that require a key, a tool, or special knowledge or effort to operate (from the interior).
- When fixed security bars are present that cover a window that provides fire escape access.
- Any lock on movable security bars for windows requiring a key (special tool) to open, whether locked or unlocked at the time of inspection.
- Placement of an item or furniture that is not resident owned and obstructs fire escape access.
- A permanently installed window-mounted air conditioner.

108

Fire Extinguisher Standard

DEFICIENCY 1: Fire extinguisher pressure gauge reads over or under-charged.
LOCATION: Unit Inside Outside

DEFICIENCY 2: Fire extinguisher service tag is missing, illegible, or expired.
LOCATION: Unit Inside Outside

DEFICIENCY 3: Fire extinguisher is damaged or missing.
LOCATION: Unit Inside Outside

MORE INFORMATION:

- This standard does not apply to fire extinguishers owned by the resident.
- Do not evaluate fire extinguishers that are not in service (i.e., in storage or awaiting service).



109

Fire Extinguisher Standard

DEFICIENCY 1: Fire extinguisher pressure gauge reads over or under-charged.
LOCATION: Unit Inside Outside

LT H&S – 24 hours



110

Fire Extinguisher Standard

DEFICIENCY 2: Fire extinguisher service tag is missing, illegible, or expired.
LOCATION: Unit Inside Outside

LT H&S – 24 hours

DEFICIENCY CRITERIA:

The date on the service tag of any fire extinguisher has exceeded one year.
 OR
 The fire extinguisher tag is missing or illegible.
 OR
 A nonchargeable or disposable fire extinguisher is more than 12 years old (based on manufacture date).

More Information:

- If the POA provides the invoice or report from the servicing fire extinguisher company, do not record a deficiency for a missing tag. The date of the report must be no more than one year from the inspection date.

111

Fire Extinguisher Standard

DEFICIENCY 3: Fire extinguisher is damaged or missing.
LOCATION: Unit Inside Outside

LT H&S – 24 hours

INSPECTION PROCESS:

OBSERVATION:

- Look along the walls for evidence of prior installation of a fire extinguisher (e.g., brackets, signage, or marked cabinets).

112

Flammable and Combustible Item Standard

DEFICIENCY 1: Flammable or combustible item is on or within 3 feet of an appliance that provides heat for thermal comfort or a fuel-burning water heater.

OR

Improperly stored chemicals.

LOCATION: Unit Inside Outside

LT H&S – 24 hours

OBSERVATION: - Look for flammable or combustible items on or near an appliance that provides heat for thermal comfort.
- Look for flammable or combustible items on or near a fuel-burning water heater.
- Look for any improperly stored chemicals (e.g., paint, gasoline, etc.).

MORE INFORMATION: - Excluding heating oil in a heating oil tank, petroleum products (e.g., gasoline, kerosene, or propane) should never be stored in the Unit or Inside areas.
- A combustible item in its original container and stored in a safe place (e.g., under a kitchen sink, in a hall closet, etc.) is not a deficiency.
- Electrical components should not be evaluated as ignition sources under this standard.

114

Dryers

REAC/UPCS – Level 3: Dryer vent is missing, damaged or is visually determined to be inoperable (blocked). Dryer exhaust is not effectively vented to the outside

NSPIRE:

DEFICIENCY 1:	Electric dryer transition duct is detached or missing.
LOCATION:	<input checked="" type="checkbox"/> Unit <input checked="" type="checkbox"/> Inside
DEFICIENCY 2:	Gas dryer transition duct is detached or missing.
LOCATION:	<input checked="" type="checkbox"/> Unit <input checked="" type="checkbox"/> Inside
DEFICIENCY 3:	Electric dryer exhaust ventilation system has restricted airflow.
LOCATION:	<input checked="" type="checkbox"/> Unit <input checked="" type="checkbox"/> Inside <input checked="" type="checkbox"/> Outside
DEFICIENCY 4:	Exterior dryer vent cover, cap, or a component thereof is missing.
LOCATION:	<input checked="" type="checkbox"/> Outside
DEFICIENCY 5:	Dryer transition duct is constructed of unsuitable material.
LOCATION:	<input checked="" type="checkbox"/> Unit <input checked="" type="checkbox"/> Inside
DEFICIENCY 6:	Gas dryer exhaust ventilation system has restricted airflow.
LOCATION:	<input checked="" type="checkbox"/> Unit <input checked="" type="checkbox"/> Inside <input checked="" type="checkbox"/> Outside



115

DEFICIENCY 1: Electric dryer transition duct is detached or missing.

LOCATION: Unit Inside

DEFICIENCY 2: Gas dryer transition duct is detached or missing.

LOCATION: Unit Inside

- If unable to locate the dryer transition duct, look behind the clothes dryer and observe if there is an accumulation of dryer lint, which indicates that the dryer transition duct may be detached or missing.

For Gas Dryers Only:

MORE INFORMATION: - Misaligned ducting should be considered detached and evaluated under this deficiency.
- A heat recovery device should be considered a deficiency under this standard.

116

DEFICIENCY 3: Electric dryer exhaust ventilation system has restricted airflow.

LOCATION: Unit Inside Outside

DEFICIENCY 6: Gas dryer exhaust ventilation system has restricted airflow.

LOCATION: Unit Inside Outside

MORE INFORMATION: - Improvised filter materials (e.g., stockings, t-shirts, etc.) attached to the duct line are considered a blockage and should be recorded as a deficiency.

117

DEFICIENCY 4: Exterior dryer vent cover, cap, or a component thereof is missing.
LOCATION: Outside

118

DEFICIENCY 5: Dryer transition duct is constructed of unsuitable material.
LOCATION: Unit Inside

DEFICIENCY CRITERIA: Dryer transition duct is not constructed of metal or an approved material.

121

Dryers (con't)

- Use of a dryer vent lint trap box with water reservoir is allowed on electric dryers only and the reservoir must be filled with water.
- Listed and labeled condensing (ductless) dryers are exempt.
- If the dryer is not positioned for use (e.g., disconnected and removed from electrical and ducting connection points), then do not evaluate them under this standard.

120

Fire Doors

How do I know if it's a fire rated door or not?

Look for a fire label or plug on the edge of the door OR on the jamb (frame)

- Sometimes it's on top of the door – this is **not code-approved**
- By code, the label should be attached to both the fire door AND frame
- It should not be missing or painted over

HUD SAYS (IN THE CASE THE TAG IS MISSING OR PAINTED OVER)

- If unable to determine if a label is present, and at least one (1) other Unit door along the same egress path has a fire label, then the inspector should treat the door as a fire labeled door.

121

Fire Doors (con't)

DEFICIENCY 1:	Fire labeled door does not open.		
LOCATION:	<input checked="" type="checkbox"/> Unit	<input checked="" type="checkbox"/> Inside	24
DEFICIENCY 2:	Fire labeled door does not close and latch or the self-closing hardware is damaged or missing such that the door does not self-close and latch.		
LOCATION:	<input checked="" type="checkbox"/> Unit	<input checked="" type="checkbox"/> Inside	24
DEFICIENCY 3:	Fire labeled door assembly has a hole of any size or is damaged such that its integrity may be compromised.		
MORE INFORMATION:	<input type="checkbox"/> Unit	<input checked="" type="checkbox"/> Inside	24
DEFICIENCY 4:	Fire labeled door seal or gasket is damaged or missing.		
LOCATION:	<input checked="" type="checkbox"/> Unit	<input checked="" type="checkbox"/> Inside	24
DEFICIENCY 5:	An object is present that may prevent the fire labeled door from closing and latching or self-closing and latching.		
LOCATION:	<input checked="" type="checkbox"/> Unit	<input checked="" type="checkbox"/> Inside	24
DEFICIENCY 6:	Fire labeled door cannot be secured.		
LOCATION:	<input checked="" type="checkbox"/> Unit	<input checked="" type="checkbox"/> Inside	24
DEFICIENCY 7:	Fire labeled door is missing.		
LOCATION:	<input checked="" type="checkbox"/> Unit	<input checked="" type="checkbox"/> Inside	24

122

DEFICIENCY 2 — UNIT: FIRE LABELED DOOR DOES NOT CLOSE AND LATCH OR THE SELF-CLOSING HARDWARE IS DAMAGED OR MISSING SUCH THAT THE DOOR DOES NOT SELF-CLOSE AND LATCH.

DEFICIENCY CRITERIA: Fire labeled door does not close (i.e., door seats in frame) and latch.
OR
Fire labeled door self-closing hardware is damaged (i.e., visibly defective; impacts functionality) or missing (i.e., evidence of prior installation, but is now not present or is incomplete) such that the door does not self-close (i.e., door seats in frame) and latch.

123

DEFICIENCY 3 — UNIT: FIRE LABELED DOOR ASSEMBLY HAS A HOLE OF ANY SIZE OR IS DAMAGED SUCH THAT ITS INTEGRITY MAY BE COMPROMISED.

DEFICIENCY CRITERIA: A fire labeled door assembly has a hole of any size.
OR
A fire labeled door assembly is damaged (i.e., visibly defective; impacts functionality) such that its integrity may be compromised.

DEFICIENCY 3 — INSIDE: FIRE LABELED DOOR ASSEMBLY HAS A HOLE OF ANY SIZE OR IS DAMAGED SUCH THAT ITS INTEGRITY MAY BE COMPROMISED.

DEFICIENCY CRITERIA: A fire labeled door assembly has a hole of any size.
OR
A fire labeled door assembly is damaged (i.e., visibly defective; impacts functionality) such that its integrity may be compromised.
OR
25% of the door surface has rust that affects the integrity of the door.
OR
There is broken or missing glass.

1

DEFICIENCY 4 — UNIT: FIRE LABELED DOOR SEAL OR GASKET IS DAMAGED OR MISSING.

DEFICIENCY CRITERIA: A fire labeled door seal or gasket is damaged (i.e., visibly defective; impacts functionality).
OR
A fire labeled door seal or gasket is missing (i.e., evidence of prior installation, but now not present or is incomplete).

125

DEFICIENCY 5 – UNIT: AN OBJECT IS PRESENT THAT MAY PREVENT THE FIRE LABELED DOOR FROM CLOSING AND LATCHING OR SELF-CLOSING AND LATCHING.

DEFICIENCY CRITERIA: An object is present that may prevent the fire labeled door from closing (i.e., door seats in frame) and latching.
OR
An object is present that may prevent the fire labeled door from self-closing (i.e., door seats in frame) and latching.

- MORE INFORMATION:** - Objects that may prevent a fire labeled door from closing and latching or self-closing and latching may include, but are not limited to:
- Wood wedge
 - Kick-down door stop
 - Trash can
 - Furniture
 - Tape
 - Rubber band

10 Point Fire Door Checklist

<p>1. Certification</p> <ul style="list-style-type: none"> Are all your fire doors certified? Are your fire doors inspected by a third-party certified company? 	<p>2. Closing</p> <ul style="list-style-type: none"> Does the door close correctly around all parts of the frame?
<p>3. Frames</p> <ul style="list-style-type: none"> Are any doors or frames warped, twisted or damaged in any way? 	<p>4. Latches</p> <ul style="list-style-type: none"> Does the door shut and engage the latch correctly?
<p>5. Gaps</p> <ul style="list-style-type: none"> Is the gap around the frame consistent and around 3-4 mm? Can you see light through the gap at the bottom of the door? Is the threshold gap larger than 10mm? 	<p>6. Hinges</p> <ul style="list-style-type: none"> Are hinges CE Marked and in good condition? Are the hinges firmly fixed into the door and frame with no missing screws?
<p>7. Seals</p> <ul style="list-style-type: none"> Do you have the correct seals at the top, sides and in the door frame? Are there any damaged seals or any missing? 	<p>8. Apertures</p> <ul style="list-style-type: none"> Have you altered any doors for glazing apertures? Is the glass used certified and tested?
<p>9. Signage</p> <ul style="list-style-type: none"> Are doors marked correctly with appropriate signage? 	<p>10. Wedges</p> <ul style="list-style-type: none"> Are any of your fire doors propped or wedged open?

CE = European Countries
UL = United States

Electric and Lighting Standards and Deficiencies



STANDARDS

- Electrical – Conductor, Outlet and Switch
- Electrical – GFCI or AFCI – Outlet or Breaker
- Electrical – Service Panel
- Lighting – Auxiliary
- Lighting – Exterior
- Lighting – Interior
- Minimum Electrical & Lighting

Electrical – Conductor, Outlet, and Switch Standard

DEFINITION:
Conductor: An object or type of material that carries electrical current.
Outlet and Switch: Installations that connect to an electricity supply.

DEFICIENCY 1: Outlet or switch is damaged.
LOCATION: Unit Inside Outside

DEFICIENCY 2: Testing indicates a three-pronged outlet is not properly wired or grounded.
LOCATION: Unit Inside Outside

DEFICIENCY 3: Outlet does not have visible damage and testing indicates it is not energized.
LOCATION: Unit Inside Outside

DEFICIENCY 4: Exposed electrical conductor.
LOCATION: Unit Inside Outside

DEFICIENCY 5: Water is currently in contact with an electrical conductor.
LOCATION: Unit Inside

MORE INFORMATION: Low voltage wiring (e.g., telephone, doorbell, thermostat) is excluded from this standard.

Electrical – Conductor, Outlet, and Switch Standard – Def #1

DEFICIENCY 1: Outlet or switch is damaged.
LOCATION: Unit Inside Outside

LT H&S – 24 hours

DEFICIENCY CRITERIA: Any portion of a visually accessible (i.e., can be reasonably accessed and observed) outlet or switch is damaged (i.e., visibly defective; impacts functionality) such that it may not safely carry or control electrical current at the outlet or switch.

OBSERVATION: - Identify all outlets and switches.
- Look at each outlet and switch for signs of damage (e.g., smoke, burn marks, arcing).

REQUEST FOR HELP: - If a personal item (e.g., clothing, small appliance, plant, toy) is concealing the outlet or switch and can reasonably be removed, ask the resident to move the item.

MORE INFORMATION: - An electrical conductor that is not enclosed or properly insulated should be evaluated under Deficiency 4 of this standard.
- An outlet that is inoperable but does not have visible damage should be evaluated under Deficiency 3 of this standard.
- A switch that is inoperable but does not have visible damage and corresponds to a hard-wired fixture or appliance should be evaluated under the respective item's standard. Examples include, but are not limited to:
- Cooking Appliance
- Garage Door
- Lighting – Auxiliary
- Lighting – Exterior
- Lighting – Interior
- Sharp Edges

132

Electrical – Conductor, Outlet, and Switch Standard – Def #2

DEFICIENCY 2: Testing indicates a three-pronged outlet is not properly wired or grounded.

LOCATION: Unit Inside Outside

Severe H&S – 24 hours

DEFICIENCY CRITERIA: Testing of a three-pronged outlet that is reasonably accessible (i.e., can be reached without moving obstructions, dismantling, destructive measures, or actions that may pose a risk to persons or property) indicates that it is not properly wired or grounded.

ACTION: - Using a three-pronged outlet tester, determine whether the outlet is properly wired and grounded.

MORE INFORMATION: - A three-pronged, ungrounded outlet that is GFCI-protected is not considered a deficiency.
- An outlet that is not energized and does not have visible damage should be evaluated under Deficiency 3 of this standard.

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Electrical – Conductor, Outlet, and Switch Standard – Def #3

DEFICIENCY 3: Outlet does not have visible damage and testing indicates it is not energized.

LOCATION: Unit Inside Outside

Severe H&S – 24 hours

OBSERVATION: - Identify all outlets that are reasonably accessible.

ACTION: - Using an outlet tester, determine whether the outlet is energized.

135

Electrical – Conductor, Outlet, and Switch Standard – Def #4

DEFICIENCY 4: Exposed electrical conductor.

LOCATION: Unit Inside Outside

LT H&S – 24 hours

DEFICIENCY CRITERIA: Electrical conductor is not enclosed or properly insulated (e.g., damaged or missing sheathing that exposes the insulated wiring or conductor, open port, missing knockout, missing outlet or switch cover, or missing breaker or fuse).

OR
An opening or gap is present and measures greater than 1/8 inch.

WOOHOO!

ACTION: - If an opening or gap is present, measure the space to determine the size of the opening or gap.

MORE INFORMATION: - If improper material is used to insulate the conductor or fill an unintentional gap, then it should be evaluated under this deficiency.

136

Electrical – Conductor, Outlet, and Switch Standard – Def #4

- Example conductors to be evaluated under this deficiency include but are not limited to:

- Knockouts
- Device cover plates that are missing (i.e., evidence of prior installation, but now are not present or are incomplete)
- Device cover plates that are damaged (i.e., visibly defective; impacts functionality)
- Lighting fixtures
- Visible wire nuts on electrical conductors
- Wiring that is insulated but not protected by sheathing or conduit
- Hardwire smoke alarm with an exposed conductor
- Wall-mounted light fixture with a damaged or missing cover



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Electrical – Conductor, Outlet, and Switch Standard – Def #4

- Example conductors that should **not** be evaluated under this deficiency include but are not limited to:

- Low voltage wiring (e.g., telephone, doorbell, thermostat)
- A device designed by the manufacturer to intentionally have a gap or space to support ventilation
- Light fixture wiring that is exposed by design
- Ceiling-mounted light fixture with a damaged or missing cover

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Electrical – Conductor, Outlet, and Switch Standard – Def #4

- If a lightbulb is missing from a fixture, then it should be evaluated under the Lighting – Interior and Lighting – Exterior standards, respectively.

- A GFCI outlet or GFCI breaker test or reset button that is missing and results in an exposed conductor should be evaluated under the Electrical – Conductor, Outlet, and Switch standard.

- Other than electrical service panels, inspector should **not** open any electrical enclosures to evaluate for this deficiency.

4. The inspector should not open any electrical enclosures to evaluate for this deficiency.
5. Do not cite electrical boxes with openable doors or covers that close and latch if they are closed and latched.
6. **To Repeat - Unsecured electrical boxes with doors should not be cited as exposed conductors unless the door is open. The doors are not required to be secured, they are only required to close and latch.**

141

What is the difference between a Breaker and a Disconnect???

Disconnect – An electrical device designed to interrupt the flow of electricity to a specific piece of equipment or a **specific area** of a building and/or unit.



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Breaker Panel - This electrical device contains either multiple breakers or fuses and is used to distribute power to multiple locations within a building and/or unit. **Shuts off a COMPONENT!** (i.e. kitchen stove/exhaust; bathroom outlets; etc.)



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GENERATOR TRANSFER SWITCHES



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Electrical – Conductor, Outlet, and Switch Standard – Def #5

DEFICIENCY 5: Water is currently in contact with an electrical conductor.

LOCATION: Unit Inside

LT H&S – 24 hours

OBSERVATION: - Visually determine if water is in contact with the electrical conductor.

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Electrical – GFCI or AFCI Outlet or Breaker

DEFICIENCY 1: GFCI outlet or GFCI breaker is not visibly damaged and the test or reset button is inoperable.

LOCATION: Unit Inside Outside

DEFICIENCY 2: AFCI outlet or AFCI breaker is not visibly damaged and the test or reset button is inoperable.

LOCATION: Unit Inside Outside

DEFICIENCY 3: An unprotected outlet is present within six feet of a water source.

LOCATION: Unit – Affirmative Habitability Requirement Inside – Affirmative Habitability Requirement
 Outside – Affirmative Habitability Requirement

↑ NOT SCORED UNTIL OCTOBER 1, 2024! ↑

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NEC Current GFCI/AFCI Guidelines

AFCI's
(Arc Fault Circuit Interrupter)

> Locations Required (per NEC):

- Kitchens
- Family Rooms
- Dining Rooms
- Living Rooms
- Parlors
- Libraries
- Dens
- Bedrooms
- Sunrooms
- Recreation Rooms
- Closets
- Hallways
- Laundry Areas



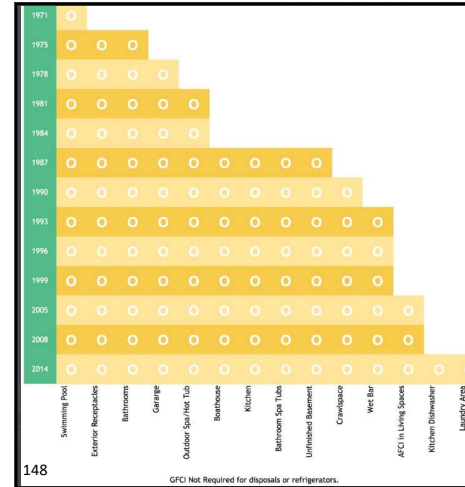
GFCI's

(Ground Fault Circuit Interrupter)

> Locations Required (per NEC):

- Bathrooms
- Garages, and accessory buildings
- Outdoors
- Crawl spaces
- Basements
- Kitchen Countertop
- Sinks, where the receptacles are within 6-feet from the top inside edge of the sink bowl
- Boathouses
- Bathtubs and shower stalls, where the receptacles are within 6-feet of the outside edge of the tub or shower stall
- Laundry areas
- Boat hoists, for outlets not exceeding 240-volts
- Kitchen dishwashers, whether they are cord-and-plug connected or hard-wired
- Crawl space lighting outlets

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If the table is too small to read, go to this website:

<https://secureservercdn.net/45.40.149.34/010.e93.m/yftpupload.com/wp-content/uploads/GFCI-Chart-1.jpg>

Or Google: what construction year were GFCI's required in Chrome and sdinspect.com's blog should pop up for you.

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AFCI/GFCI Code Requirements

Updating receptacles to current code (in this case, installing GFCI's) is only required with **new construction, alterations, modifications, repairs** – typically, if you pull a permit, you will have to conform to the current code requirements but in the case of electric **repairs/replacements you must upgrade** per NEC 406.4.

ALWAYS CHECK WITH YOUR AHJ (Authority Having Jurisdiction) for their requirements!

This rule is listed as an Affirmative Habitability Requirement – HUD states in the Standards final rule pg 20 as well as the Risk Analysis that although expensive, they are essential to resident safety.

NYCHA HQS RULE

Kitchen and Bathroom

- Must have a Ground Fault Circuit Interrupter (GFCI) outlet installed within 6 feet of a water source in the bathroom if the building was built or renovated after 1986. For kitchens, a GFCI outlet must be installed if the building was built or renovated after 1996.
- Bathrooms require a permanent light fixture but an outlet is not required.
- The Kitchen requires a permanent outlet but a permanent light fixture is not required.

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Electrical – GFCI or AFCI Outlet or Breaker – Def #1 and #2

DEFICIENCY 1: GFCI outlet or GFCI breaker is not visibly damaged and the test or reset button is inoperable.

LOCATION: Unit Inside Outside

Severe H&S – 24 hours

DEFICIENCY 2: AFCI outlet or AFCI breaker is not visibly damaged and the test or reset button is inoperable.

LOCATION: Unit Inside Outside

REQUEST FOR HELP: - Notify the POA that these circuits will be interrupted and may impact electrical devices (e.g., computer, medical device, television) on the same circuit as the GFCI outlet or GFCI breaker being tested.
- If a personal item (e.g., clothing, small appliance, plant, toy) is concealing the GFCI outlet or GFCI breaker and can reasonably be removed, ask the resident to move the item.

MORE INFORMATION: - Some outlets are wired in series and may have one GFCI that provides protection to the entire series.
- An acceptable industry standard tester may be used in place of the test and reset buttons if it meets all requirements of Underwriters Lab Standard 1436 for Outlet Circuit Testers.

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Electrical – GFCI or AFCI Outlet or Breaker – Def #3

DEFICIENCY 3: An unprotected outlet is present within six feet of a water source.
 LOCATION: Unit – Affirmative Habitability Requirement Inside – Affirmative Habitability Requirement Outside – Affirmative Habitability Requirement

Severe H&S – 24 hours

DEFICIENCY CRITERIA: Outlet is present within six feet of a water source (i.e., sink, bathtub, shower, water faucet, toilet) that is located in the same room.
 AND
 Outlet is not GFCI protected.

ACTION: - Once identified, measure from the center of each water source (i.e., sink, bathtub, shower, water faucet, toilet) to the center of each outlet located within the same room.

- (8) Sinks — where receptacles are installed within 1.8 m (6 ft) from the top inside edge of the bowl of the sink
- (9) Boathouses
- (10) Bathtubs or shower stalls — where receptacles are installed within 1.8 m (6 ft) of the outside edge of the bathtub or shower stall

2023 NEC / NFPA 70
210.8

For the purposes of this section, the distance from receptacles shall be measured as the shortest path the power supply cord connected to the receptacle would follow without piercing a floor, wall, ceiling, or fixed barrier.

Electrical – GFCI or AFCI Outlet or Breaker – Def #3

Good News:

- More Information:
- An outlet designated for a major appliance (e.g., water heater, HVAC, refrigerator, washing machine, dishwasher, garbage disposal, microwave, etc.) should not be evaluated under this standard, regardless of its distance from the water source.
 - An outlet located below a countertop and within an enclosed cabinet should not be evaluated under this standard, regardless of its distance from the water source.

- A dedicated outlet is a receptacle outlet that is only capable of serving that specific appliance.

Bad News:

1. For those with older housing stock, this could be a pretty substantial financial burden to comply with.
2. It's considered a Severe H&S - a 24-hour repair

Electrical – Service Panel Standard



DEFICIENCY 1: Electrical service panel is not readily accessible.
 LOCATION: Unit Inside Outside

DEFICIENCY 2: The overcurrent protection device is damaged.
 LOCATION: Unit Inside Outside

DEFICIENCY 3: The overcurrent protection device is contaminated.
 LOCATION: Unit Inside Outside

Electrical – Service Panel Standard – Def #1

DEFICIENCY 1: Electrical service panel is not readily accessible.
 LOCATION: Unit Inside Outside

Moderate H&S – 30 days

DEFICIENCY CRITERIA: Electrical service panel is not reasonably accessible (i.e., cannot be reached and opened without moving obstructions, dismantling, destructive measures, or actions that may pose a risk to persons or property).

REQUEST FOR HELP: - If a personal item (e.g., picture, calendar, rolling cart, clothing, small appliance, plant, toy) is concealing the electrical service panel and can reasonably be removed, ask the resident to move the item.

MORE INFORMATION: - If the electrical service panel servicing the Unit is located behind a locked door, and the resident or POA cannot unlock the door at the time of the inspection, then it is not reasonably accessible as defined by this standard.
 - If the resident or POA cannot unlock the electrical service panel door at the time of the inspection, then it is not reasonably accessible as defined by this standard.

(F) Locked Electrical Equipment Rooms or Enclosures

Electrical equipment rooms or enclosures housing electrical apparatus that are controlled by a lock(s) shall be considered accessible to qualified persons.

2023 NEC / NFPA 70
110.26 (F)

Electrical – Service Panel Standard – Def #1



- Other than electrical service panels, inspector should not open any electrical enclosures to evaluate for this deficiency.

4. The inspector should not open any electrical enclosures to evaluate for this deficiency.
5. Do not cite electrical boxes with openable doors or covers that close and latch if they are closed and latched.
6. **To Repeat - Unsecured electrical boxes with doors should not be cited as exposed conductors unless the door is open. The doors are not required to be secured, they are only required to close and latch.**

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Electrical – Service Panel Standard – Def #2

DEFICIENCY 2: The overcurrent protection device is damaged.
LOCATION: Unit Inside Outside

LT H&S – 24 hours

DEFICIENCY CRITERIA: The overcurrent protection device (i.e., fuse or breaker) is damaged (i.e., visibly defective; impacts functionality) such that it may not interrupt the circuit during an overcurrent condition.

OBSERVATION: - Visually inspect the overcurrent protection device for damage (e.g., burns, melted materials, smoke).

MORE INFORMATION: - Do not remove the panel cover (i.e., dead front cover).
 - An electrical conductor that is not enclosed or properly insulated should be evaluated under the Electrical – Conductor, Outlet, and Switch standard.

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Electrical – Service Panel Standard – Def #3

DEFICIENCY 3: The overcurrent protection device is contaminated.
LOCATION: Unit Inside Outside

Severe H&S – 24 hours

DEFICIENCY CRITERIA: The overcurrent protection device (i.e., fuse or breaker) is contaminated (e.g., water, rust, corrosion).

Per HUD:
 i.e. = Specifically these things
 e.g. = For Example

MORE INFORMATION: - Do not remove the panel cover (i.e., dead front cover).

(B) Integrity of Electrical Equipment and Connections 2023 NEC / NFPA 70 110.12 (B)
 Internal parts of electrical equipment, including busbars, wiring terminals, insulators, and other surfaces, shall not be damaged or contaminated by foreign materials such as paint, plaster, cleaners, abrasives, or corrosive residues. There shall be no damaged parts that may adversely affect safe operation or mechanical strength of the equipment such as parts that are broken; bent; cut; or deteriorated by corrosion, chemical action, or overheating.

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How Do I Prepare for an NSPIRE Inspection?

1. Inspect the Units...as much as possible...and **follow up that the repairs were completed**
 - HUD states in the NSPIRE Final Rule the following:

“HUD agrees that owners and agents must abide by their rights and responsibilities which includes **enforcing lease provisions and house rules and PHA policies** alongside of their responsibilities to maintain the physical condition of the property. PHAs and owners can ensure that residents are aware of policies, understand their responsibilities, and collect reasonable fees for damages. PHAs and owners can also stay abreast of property conditions with regular inspections and the annual self-inspection process included in NSPIRE.

HUD also agrees that additional punitive financial charges above what is allowed in the lease provisions and security deposit administration would likely **not be an effective means** to discourage tenant-induced damage.”

2. EDUCATE the residents! The more they understand – the better off both of you will be.
3. Offer a small incentive to the residents like a Starbucks gift card or get a donation from a local business if they communicate with you. Ultimately you need to get the resident **INVOLVED** in the process because you can only “police” them so much!
4. You will have to upload ALL the information UPCS inspectors used to ask for (certificates, construction years, property profiles, unit occupancy, etc.) ***Don't forget LBP Exemption, if applicable!!!***
 - PHAs must update IMS/PIC
 - MF must update iREMS.
 - REAC will allegedly contact you or the assigned field office 30 to 90 days prior to the planned inspection.

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