

REAC Physical Inspections National Affordable Housing Management Association

July 17, 2020



Inspections RTO: Safety First



The highest priority guiding the resumption of inspections is the health, safety and welfare of all those involved in the conduct of HUD's inspection activities. This includes residents, PHA & POA staff, Federal/contract inspectors, and other HUD employees.



Resuming HUD physical inspections will require deference and flexibility for those involved and HUD inspectors must exercise an abundance of caution. Inspectors will likely encounter circumstances where a scheduled inspection cannot occur after arriving on-site due to health and safety concerns.



REAC will provide significant guidance to its Federal and contact inspectors for the safe conduct of inspections, including specifying the required PPE necessary for our contract inspector partners and providing PPE for Federal inspectors.

Target Inspection Resumption: TBD



Inspections RTO: Purpose, Objectives, Outcomes

Purpose

The purpose of the HUD Physical Inspections RTO plan is to detail all necessary activities necessary for the safe resumption of inspections of HUD-assisted rental housing portfolios; establish conditions and a timeline for the resumption of inspections; and identify risks and constraints to the safe conduct of inspections.

Objectives

- Safely resume inspections of HUD's Public Housing and Multifamily Housing portfolios
- Target/prioritize and inspect those properties most in need of inspection using risk-based criteria
- Demonstrate to HUD's stakeholders the continued importance of physical inspections to the health and safety of families and HUD's mission to meet the need for quality affordable rental homes

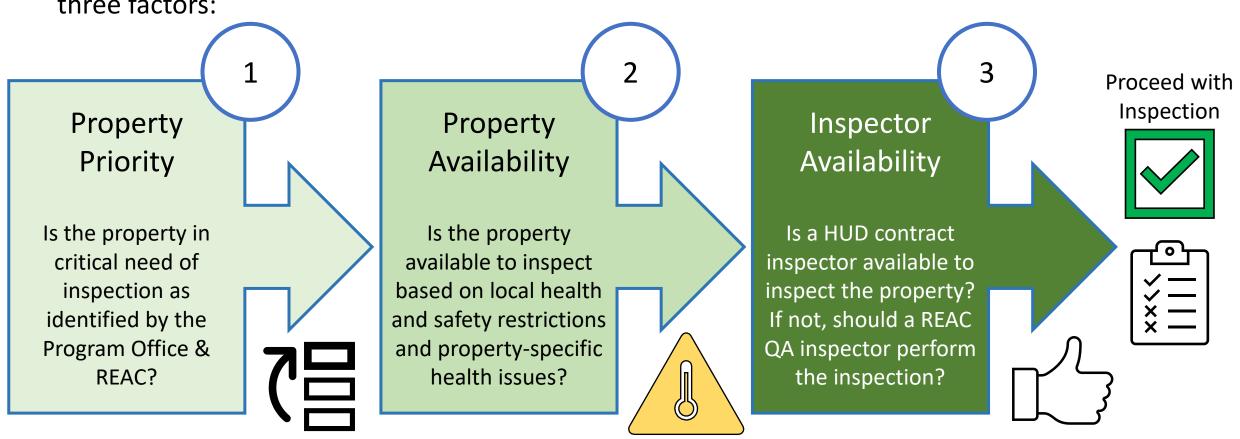
Outcomes

- Identified and implemented strategies to keep all parties involved in the inspection process safe
- Reduced the backlog of physical inspections for those properties not assessed in the last three years
- Successfully inspected properties identified as high-risk
- Created innovative inspection types that meet or exceed the quality of inspections before COVID-19



Inspections RTO: Inspecting Priority Properties

Following the clearance of all RTO gates, REAC will prioritize properties for inspection based on three factors:





Inspections RTO: Planning, Communications & Safety Gates

Planning & Approval Gates

REAC develops a plan for resuming physical inspections that prioritizes safety and identifies all logistics, protocol, communications, and other challenges that must be addressed for the RTO

REAC identifies states/localities where inspections can likely begin and properties in these areas that meet the priority criteria for being inspected (pending PHA or POA availability to participate)

REAC implements necessary unilateral contract changes/notices of intent with contract inspection partners concerning the safe resumption of inspections

HUD leadership approves resumption of inspections AND HUD approves employee activities necessary for resumption of inspections such as travel to property sites

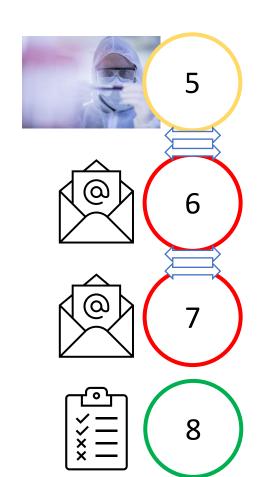
Communications & Safety Gates

REAC arranges for PPE for Federal inspectors and modifies contracts in place with inspection vendors to reimburse for PPE

REAC notifies individual PHAs and POAs 45 days before the planned resumption of inspections

REAC provides 14-day notice of impending inspection

REAC re-validates the safety/availability of the property and conducts an inspection







Inspections RTO: Identifying & Notifying Eligible Properties



REAC will work with OFO, PD&R, and FPM to develop a methodology for identifying, validating, revalidating, and notifying PHAs and POAs that meet the property eligibility criteria by analyzing available data from state and local governments, CDC, other government entities, and media reports

Key Eligibility Criteria

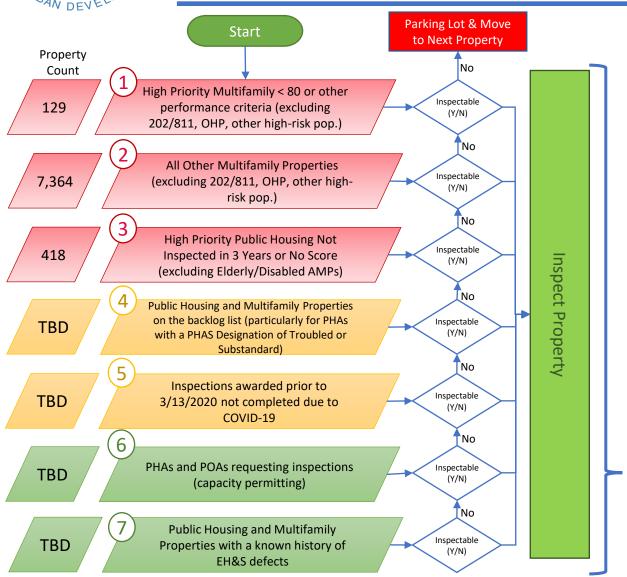
- ✓ Property is located in a jurisdiction in a phase of reopening allowing substantial in person commerce (e.g. inside restaurant dining, in-store shopping)
- ✓ COVID-19 cases in the property's locality (e.g. city) have been trending downward or remaining flat for a minimum of 14 days. Related public health data (ICU beds) is similarly positive.
- ✓ There are no known and specific COVID-19 issues (outbreaks) at the PHA or property in question regardless of the locality's phase of reopening or case trends
- ✓ Where applicable within a given radius, HUD FPM or GSA has provided guidance to local HUD employees that they may report to the local office nearest where the property is located
- ✓ Air/rail/car travel to and from the property can be achieved with appropriate safety precautions

Notification/Validation Steps

- ✓ REAC will post to HUD's website a list of PHAs and Property Owners/Agents (POAs) that meet all five availability criteria
- ✓ REAC will e-mail PHAs and POAs the 45-day notice and the list of properties owned/managed that are subject to the 45-day notice
- ✓ REAC will perform ongoing, regular re-evaluations/validations of the properties that have received 45-day notices and notify PHAs/POAs in writing if the status of the property changes due to updated conditions/data
- ✓ Properties still meeting the five criteria at the end of the 45-day notice period may be sent a 14-day inspection notice
- ✓ REAC will perform a final validation of the criteria two business days before the inspection and inspectors will always have the ability to evaluate conditions after arriving on-site and not conduct the inspection if warranted

THENT OK AND URBAN DEVELOR

Inspections RTO: Inspecting Priority Properties



Property Availability

Is the property available to inspect based on local health and safety restrictions and property-specific health issues? The ability to inspect properties will be dictated primarily by the availability of properties to inspect as determined by local guidelines and the safety of all inspection parties. Although these priorities represent a desired risk-ranking of inspections to perform, it is unlikely that all properties in each priority category will be inspected before moving to the next category.

REAC will not inspect properties with potentially higherrisk resident populations including elderly and disabled properties, including: 202/811, 232, 236 and Public Housing Elderly/Disabled AMPs

Priority Considerations

- Multifamily did not waive inspection requirements
- PIH Notice 2020-05 provides waiver of inspections for PHAs until 12/31/20
- Inspecting properties with inspections >3 years old is required to meet
 HUD's published guidelines and HUD needs insight into these properties
- Reducing the backlog of inspections where feasible
- Resuming those inspections already contracted speeds up RTO
- Enabling PHAs and POAs to lift properties out of troubled status



Inspections RTO: Other Safety & Logistics Risks

- Availability of PPE
- Pre-Inspection Temperature Checks/Validation
- On-site Notification Processes for Health-Related Issues Impacting the Inspection
- Travel Considerations
- Second-Wave COVID-19 Flare Ups
- Managing Social Distance in Occupied Units
- Pre-/Post-Inspection COVID-19 Testing for Inspectors



Inspections RTO: Protocols

- REAC has developed a detailed inspection protocol guide for both Federal and contract inspectors
- The protocols detail instructions for inspectors to follow in the conduct of an inspection when inspections resume
- Protocols cover the following activities/requirements:
 - Pre-, Day Of, and Post-Inspection Protocols
 - Travel/Logistics (including consideration of stay at home orders)
 - Personal Protective Equipment (PPE)



Inspections RTO: COVID-19 Sample Special Protocols

- HUD will require contractors to wear face masks and gloves and use hand sanitizer, at a minimum, when conducting inspections.
- POAs are responsible for communicating local restrictions relating to COVID-19 to the contractor/inspector at the time the inspection is scheduled
- HUD will determine if the inspection should be cancelled due to local restrictions or reported COVID-19 cases at the with guidance from the Field Office

NSPIRE Demonstration Update



NSPIRE Demonstration Goal: 4500 Properties

- 3218 Multifamily Properties Approved as of July 8, 2020
- 769- Public Housing Properties Approved
- 4 Office of Healthcare Program Properties Approved

Preparing for RTO

Revised Standards

https://www.hud.gov/program offices/public indian housing/reac/nspire/standards

- Recently published the list of Life-Threatening Deficiencies
- Integrating NSPIRE Standards into HCV and Project-Based programs
- Revised 65 Standards into new template
- Release Full list of Version 2 Standards July 31, 2020

Policy and Regulatory

Recently submitted revised NSPIRE Proposed Rule for Approval

NSPIRE Demonstration Update



Customer User Experience/Communications

Launch of new NSPIRE website

https://www.hud.gov/program offices/public indian housing/reac/nspire

Published Get NSPIREd Newsletter 3rd Edition June 2020

https://www.hud.gov/sites/dfiles/PIH/documents/HUD-Get-NSPIREd-Newsletter-2020-June.pdf

New Scoring Model

SOP Validation Scoring Model Analysis and Mockups and Associated Documentation

New Inspection Software

- NSPIRE Team is developing and testing Salesforce back-office compatibility
- Collaborating with HUD Offices to develop an IT solution

Program Alignment

NSPIRE and HCV integration

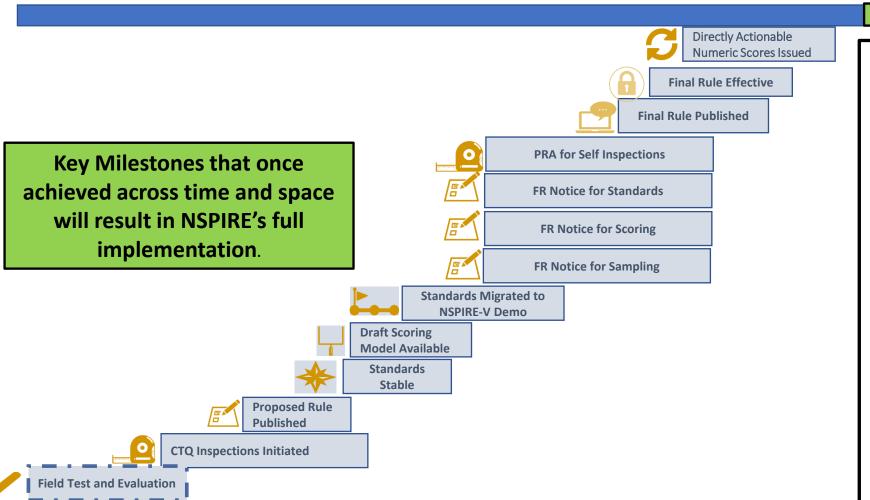


Demo Launched

Today

NSPIRE Major Milestones





NSPIRE's Full Implementation

Desired Future-State

- Stakeholder Buy-In
- All Resident <u>health and</u> <u>safety</u> hazards identified and removed
- <u>Less complex</u> inspection protocol; aligned with quality of resident health and safety
- A <u>singular inspection</u>
 protocol that aligns all
 property physical
 inspections
- Increased consistency and accountability in the physical inspection protocol <u>Proper</u> identification of substandard properties
- <u>Compliance</u> with property self-inspection protocol

Future State

Why Volunteer? Because It's S.M.A.R.T!













Set the Standard

- Collaborate with HUD to shape the new inspection standards through feedback and direct access to HUD decision-makers.
 - This collaborative partnership will help improve the relationship between you and HUD.
 - Standards that are revised from your participation and input are posted on HUD's website at

https://www.hud.gov/program offices/public indian housing/reac/nspire/standards



Maintain Your Current Score

- No UPCS inspections during the Demonstration.
- Your UPCS score will be carried forward for the duration of the Demonstration.



Act Now to Get Ahead

- Your participation allows for sharing of information and keeps you informed of the latest NSPIRE updates.
- Secure your spot today! There are thousands of eligible properties, but only 4,500 will be selected to participate in the NSPIRE Demonstration.



Receive Advisory Scores

- Find out how properties will score under NSPIRE before final rule and implementation.
- Receive an advisory score that will allow you to be better informed and prepared for when NSPIRE goes into effect.
- Self-inspections are evaluated, not scored.



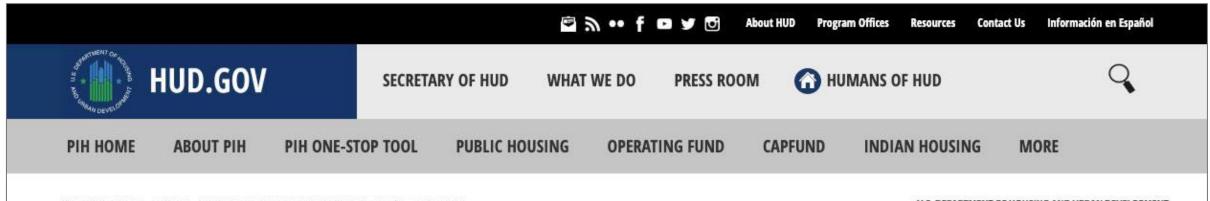
Train for the Future

- Get technical assistance on the new standards, scoring, sampling, and health and safety deficiencies.
- Participate in NSPIRE focus groups, workshops, listening sessions, and HUD subject matter experts to prepare your team with the skills they need.
- Prepare your team with the skills they need.



How to Volunteer

https://www.hud.gov/program_offices/public_indian_housing/reac/nspire/registration



SIGN UP FOR NSPIRE DEMONSTRATION!

For the NSPIRE demonstration, HUD is seeking participation from 4,500 properties and will select from a nationwide pool of Public Housing Authorities (PHAs) and Property Owners and Agents (POAs).

PHAs and POAs are encouraged to register one or multiple properties for acceptance into the demonstration, but there is no requirement to submit all properties within a portfolio. Submission of an application does not constitute acceptance into the program nor does







Follow-On Steps

- Future Communication and Stakeholder Outreach <u>https://www.hud.gov/program_offices/public_indian_housing/reac/ns-pire/webinars</u>
 - Virtual NSPIRE Standards Workshop Series Summer 2020
 - July 29, 2020 (Limited Seating Invite Only)
 - August 18, 2020 (Limited Seating Invite Only)
 - September 1, 2020 (Limited Seating Invite Only)
 - NSPIRE Standards Webinar Aug 7, 2020 (pre-recorded and posted on NSPIRE website)
 - Get NSPIREd Newsletter Future Issues- Sign Up via link below <u>https://www.hud.gov/subscribe/signup?listname=National%20Standards%20for%20Physical%2</u> <u>Olnspection%20of%20Real%20Estate&list=REAC-NSPIRE-L</u>
- NSPIRE Development
- Public Comments and Feedback

