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Office of General Counsel
Regulations Division
Department of Housing and Urban Development
451 Seventh Street, SW
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Washington, DC 20410-5000

RE: [Docket No. FR-6086-N-04] Request for Comments: National Standards for the Physical Inspection of Real Estate and Associated Protocols, Proposed Scoring Notice

The Council of Large Public Housing Authorities (“CLPHA”) appreciates the opportunity to submit comments to the United States Department of Housing and Urban Development (“HUD”) in response to the notice titled “Request for Comments: National Standards for the Physical Inspection of Real Estate and Associated Protocols, Proposed Scoring Notice.”

CLPHA is a non-profit organization that works to preserve and improve public and affordable housing through advocacy, research, policy analysis, and public education. Our membership of more than seventy large public housing authorities (“PHAs”) own and manage nearly half of the units in the nation’s public housing program, administer more than a quarter of the subsidies in the Housing Choice Voucher (“HCV”) program, and operate a wide array of other housing programs.

While CLPHA understands HUD’s need to update its decades-old inspection protocols and prioritize the health and safety of residents, we have significant concerns about HUD’s timeline to implement NSPIRE for public housing, multifamily, and HCV programs. Particularly at a time when PHAs continue to grapple with administrative and operational challenges caused by the ongoing COVID-19 pandemic, it is not realistic or practical to implement NSPIRE in 2023.

CLPHA **strongly urges** HUD to delay the implementation of NSPIRE beyond 2023 and until the challenges detailed in this letter are fully addressed. Once HUD issues NSPIRE’s final rulemaking, CLPHA also recommends that HUD allow PHAs a minimum of **one year** after final rulemaking is completed to acquire the required mobile technology, retrain/hire staff and contractors, upgrade PHA software, and adapt processes and procedures to deploy NSPIRE and NSPIRE-V. We do not believe this would preclude PHAs from addressing unit deficiencies and emergency conditions. Providing advisory scores would not adversely impact the health and safety needs of residents.

CLPHA has hosted several listening sessions to hear from our members that are participating in the NSPIRE and NSPIRE-V demonstrations. CLPHA previously [submitted comments on the NSPIRE proposed standards](#) and voiced similar concerns. We are very concerned about the

following observations detailed by our members. We appreciate the opportunity to provide feedback and engage with HUD throughout the NSPIRE implementation process.

Inability to Evaluate Scoring Methodology from NSPIRE Demonstration

CLPHA is very concerned that HUD is seeking comments on the NSPIRE scoring methodology prematurely. HUD has not concluded its demonstration or provided scores to PHAs that participated in demonstration inspections. In the NSPIRE Proposed Scoring Notice, HUD admittedly states that certain standards “may need more calibration through field testing”. Yet, we are being asked to provide input on the scoring methodology in the absence of a fully transparent environment on an accelerated 30-day timeline. Likewise, the demonstration never provided an opportunity for participating PHAs to provide feedback on their experience. Without access to demo scores, the industry is unable to properly evaluate the scoring methodology. HUD heeded CLPHA’s recommendation to create an NSPIRE Score Calculation Tool, but it was made public only 3 days before the comment window for the NSPIRE scoring methodology closed. This is insufficient time for PHAs to use the tool and evaluate how the new methodology would perform.

We respectfully ask that HUD provide all demonstration scores to PHAs that participated in the demonstration along with explanations of each score prior to the publication of the NSPIRE Final Rule. We also request that HUD provide *at least 60 days* to thoroughly review the demonstration scores to assess the impact and provide additional feedback. PHAs and industry groups will need *at least 60 days* to fully analyze, gather feedback, and provide written comments on both the NSPIRE Proposed Scoring and Administrative Procedures Notices.

NSPIRE Rollout Timeline Is Unrealistic

The current timing for the overall rollout of NSPIRE is unrealistic. HUD is unnecessarily rushing the implementation of NSPIRE while providing inadequate time or data for PHAs to fully analyze the results of the demonstration. HUD’s Real Estate Assessment Center (REAC) plans to begin NSPIRE inspections on July 1, 2023, and for the HCV program on October 1, 2023, yet the NSPIRE Final Rule and Administrative Procedures Notice have not yet been published and both must be published before inspections can commence. Critical information needed to fully assess the scoring methodology, like mandates to submit evidence that deficiencies have been corrected and how to notify residents of inspection results, will be contained in the Administrative Procedures Notice, which HUD currently plans to publish *after* the NSPIRE Final Rule. This timeline is not feasible. HUD should not roll out NSPIRE in a piecemeal approach. REAC has not designated time in the rollout plan to consider and respond to public comments in a public forum. If REAC wishes to gather meaningful feedback on NSPIRE, it must provide results from the demonstration and adequate time for stakeholders to review the results and submit feedback.

Inequitable Applicability Across HUD Programs

This scoring notice applies to Public Housing, Project-Based Rental Assistance, Section 202, Section 811, and HUD-Insured Multifamily. Yet, HUD has verbally stated that HCV program participants will be permitted to utilize HQS as an alternative inspection protocol for at least one year following the rollout of NSPIRE. An uneven rollout timeline across HUD programs will create confusion and inequitably impact results across PHAs with different portfolio compositions. Public Housing and other HUD programs should be given an equal amount of time to prepare as HCV participants are afforded.

Provide at least 18-24 Months of Advisory Scores

While it is helpful that the new affirmative standards won't be scored for the first 12 months, multiple large PHAs indicated that this is insufficient to provide training for inspectors and

contractors, test the software, and develop new policies and procedures. For the reasons mentioned above and throughout this letter, we ask that REAC provide *at least* 18-24 months of advisory scores before beginning inspections for official scores of record. During this time, the scoring methodology can be tested in an iterative process. After each testing period, REAC should provide the results of those advisory scores to PHAs and industry groups and allow for public comment on the methodology and standards. This will allow for a fine-tuning of the methodology such that it meets HUD's goals of protecting the health and safety of residents without unduly burdening PHAs. This would not preclude PHAs from addressing unit deficiencies and emergency conditions. Providing advisory scores would not adversely impact the health and safety needs of residents.

Provide Stakeholders with Updated Timeline

In addition to an extended rollout timeline and 18-24 months of advisory scores, we need clarity from REAC on the series of events and how they will impact each HUD program. HUD must provide an updated timeline for when each Notice will be published, how long the comment period will be for each, and the final effective dates for NSPIRE inspections across all HUD programs.

Normalization and Weight of Scores

REAC claims to have evaluated 40,000 Uniform Physical Condition Standards (UPCS) inspections and 20,000 NSPIRE inspections to develop the proposed scoring methodology. REAC indicated that properties that scored in the 80s or above in UPCS have scored better under NSPIRE, while properties that scored in the 60s or below under UPCS have scored worse under NSPIRE. Yet without having access to demo scores, it is difficult for our organization and our members to comment on the methodology's weighting system and score normalization – arguably the most important aspects of the standards.

The score weighing does not consider the overall size of the property inspected after the initial score has been normalized to the sample size. Since inspections are grading assets and larger properties naturally have more assets, normalizing scores by dividing the score into a max of 32 units would unfairly skew the results against larger PHAs. The current scoring methodology does not account for the number of buildings inspected, so a property that has more buildings is subject to more inspectable areas and potentially an artificially lower score than a property with the same number of units inspected but fewer buildings.

1. Adjust Weighting to Account for Large PHAs with More Inspectable Areas

The normalization of individual scores to the number of units in the 32-unit max sample size is unfairly skewed against large PHAs. PHAs with larger unit sizes and larger buildings will have more assets inspected, meaning more defects can be cited. If a large property with 900 units spans across 10 buildings, there may be 10,000 or more assets subject to inspection compared to a property with 475 units across 5 buildings. With more inspectable areas outside and inside at the larger property, there is a higher probability that more defects will be found. Yet regardless of the number of defects cited at each property, that score still gets divided by 31, meaning the score would unfairly be lower at the larger property.

2. Provide More Time for PHAs to Use the Score Calculation Tool

We appreciate that HUD heard our recommendation to create a score calculation tool for PHAs. However, the tool was published with only 3 business days for PHAs to use the tool before comments on the scoring methodology were due. Our members can provide more substantive feedback on the scoring methodology by using the tool to convert UPCS scores to NSPIRE scores. The formulas used to calculate sample size and normalize scores are

difficult for experts to understand. Several of our members attempted to use the NSPIRE scoring methodology to calculate what their demo scores would have been since REAC has not provided them yet, but most were unable to achieve an accurate calculation.

3. Provide Clarity on the Formula

The normalization and unit size calculations are inherently complex, even for maintenance experts. One PHA attempted to calculate their score using the NSPIRE methodology and got a negative score, which should not be possible under NSPIRE according to this notice. This illustrates the difficulty of understanding the complex mathematical formula that is being used to normalize and weigh scores. HUD should provide additional clarity via a tutorial or guidance document that further explains the formulas with examples.

Inconsistencies in the New Standards

Without having access to all demo participants' scores, commenting on the scoring methodology is difficult. With that in mind, CLPHA members offered feedback on several inconsistencies in the new standards, including some standards that were repeatedly cited during demo inspections. Members participating in the NSPIRE Demonstration have reported more health and safety-related 24-hour findings than were under UPCS. Many members also shared that inspectors' subjectivity led to inconsistency. These must be addressed before REAC proceeds to finalize the Scoring Notice, Administrative Procedures Notice, and Final Rule.

Specific standards that were repeatedly cited:

1. Blocked Egress

The standards stipulate that there must be at least one unobstructed primary means of egress from the unit and at least two means of egress from the building to get outside. Multiple members reported having been cited multiple times for blocked egress deficiencies even when these conditions were met. Some were due to tenants' personal belongings blocking windows or doors even though there was still more than one way to exit the unit. Others were due to the unique layout of the unit. As an example, older buildings that lack central air conditioning may contain units that only have one window and have a window-mounted air conditioning unit. In such cases, the property should not receive a blocked egress deficiency. PHA staff should not need to move tenants' furniture or belongings prior to an inspection to avoid this deficiency. A blocked egress deficiency carries the maximum defect severity level multiplier, so this standard should be reexamined to provide nuance.

2. Inoperable Light Fixtures

Inspectors misinterpreted the inoperable light fixture deficiency at several PHAs. The criterion for this deficiency is "*A permanently installed light fixture is inoperable (i.e., the overall system or component thereof is not meeting function or purpose; with or without visible damage).*" Yet, some inspectors cited light fixtures that were merely missing the globe covering as "exposed wiring" even though there were no exposed wires, the pictures clearly showed no exposed wiring, and the light was in good working order.

3. Sharp Edges

Resident-caused damages such as broken glass should not negatively impact the inspection score. One of our members reported that upon receiving a deficiency for a broken mirror, they had to generate a work order and have maintenance staff dispose of the mirror and clean any shards so the PHA could report the mitigation in the case management system. Another received three citations for potential puncture hazards at one building even though

the pictures showed the hazard was in some bushes and not along a path of travel. This standard should be relaxed to only cite sharp edges that locationally pose a risk to residents.

4. Holes in Walls

Our members reported citations for holes that “penetrate” through a wall even in cases where there was nothing penetrating through the wall as shown in pictures. Pictures taken by inspectors showed scuffs and no penetrating holes, or tiny screw-holes that did not likely penetrate through to an adjoining room (as the standards stipulate). This standard needs to be relaxed to clarify pilot holes for screws and scuffs or dents do not count as a deficiency.

5. Peeling Paint

This standard should also be relaxed as inspectors over-cited it. PHAs were cited for peeling paint multiple times at the same property, with one property being cited over 20 times for exterior peeling paint. Several others received multiple peeling paint citations for the same building, which is excessive and will result in lower scores that do not accurately reflect the overall conditions of the property.

6. Ground Fault Circuit Interrupters (GFCIs)

This new requirement was not applied evenly by inspectors. Properties with ‘daisy chained’ GFCIs were cited for each individual GFCI rather than one deficiency; this alone caused a failed inspection at one property. HUD must acknowledge that older buildings may have to reconfigure their electrical systems to comply with this standard as it is currently written, which would be very costly and burdensome for PHAs and residents. HUD should relax this standard or build-in exceptions for buildings with daisy-chained GFCI configurations.

Variation in Inspectors’ Application of Standards

Multiple members reported that inspectors were inconsistent in their application of the scoring. Inspectors repeatedly cited standards from old UPCS protocol, such as referencing Non-Industry Standards (NIS). Hold-over behaviors among inspectors were present across the board, indicating that more training is needed. Inspectors also placed a focus on certain standards more heavily than others. Different inspectors had varying levels of competency; some were unsure how to classify properties prior to the inspection, while others misinterpreted standards and took pictures that did not show the deficiency as defined in the standards. All these issues must be corrected before the scoring methodology can be properly evaluated.

1. Citing old protocols, such as Non-Industry Standard repairs (NIS)

The elimination of the Non-Industry Standards (NIS) repairs deficiency was an attractive aspect of NSPIRE. Unfortunately, there are inspectors who still view deficiencies using the NIS lens. Several members reported more than one inspector used the term NIS verbally while recording a deficiency. Inspectors should not be able to enter the term NIS into the software, and it should be flagged if they do so that REAC can correct the deficiency. REAC must ensure that the inspection companies contracted to conduct the NSPIRE inspections thoroughly train their inspectors on the new NSPIRE standards to ensure no holdover behaviors exist.

2. Pictures do not accurately reflect conditions

Our members reported several instances of inspectors taking photos that did not fully capture the nature or location of the deficiency. Some pictures did not show the full location of the deficiency, which would have been important context for reviewing whether the deficiency was valid. For instance, whether the defect is located along a path of travel

should matter, and it should be shown in pictures. Pictures of supposed hole-in-the-wall defects should show the depth and size of a hole, and not just a blemish or scuff mark as did some pictures.

3. Repeatedly citing the same deficiency as multiple deficiencies

During roundtable discussions, a CLPHA member shared that during an NSPIRE inspection the inspector cited every piece of broken glass rather than recording it as one deficiency. Another cited peeling paint over 20 times during a single inspection, while another cited it multiple times on the exterior of one building alone. In a building with a master GFCI that had multiple other GFCIs daisy-chained together, the inspector cited every GFCI individually. Broken floor tiles were also counted as multiple deficiencies rather than one. These will all unfairly result in lower scores that do not accurately reflect the conditions in the unit, resulting in lower scores for PHAs.

Resident-Caused Damages

PHAs should not be held responsible for tenant-caused damages. Tenants frequently move furniture and personal belongings in ways that can result in defects. NSPIRE focuses on the “habitability and residential use of structures” but omits considerations for the real-life in-unit outcomes of how residents live. Deficiencies that may be caused by residents could include furniture blocking an egress route or a towel-bar string not being in place. Tenants have a major influence on the conditions of their units. PHAs should not be scored on tenant-damaged property or tenant-caused defects. CLPHA recommends that inspectors do not deduct points for damage to a unit caused by residents in cases where the damage has not been reported to the PHA or when repair work is underway or in progress (such as having work scheduled or materials already ordered).

Frequency of Inspections

HUD intends to use scores on a 0-100 point scale to determine the frequency of inspections and higher-scoring properties will be inspected less frequently. Our members are concerned with REAC’s plans for properties that received the lowest scores under UPCS to be inspected soonest under NSPIRE. By comparison, PHAs with properties in excellent condition are given more time between inspections. A property that received a score of 90 in March 2023 would have until March 2026 and will be scored with new affirmative standards, while a property that received a score of 59 would have much less time to correct more defects. Properties that previously received the lowest scores under UPCS should be given more time before being inspected under NSPIRE.

Giving low-scoring properties less time between inspections is inequitable for some PHAs, especially when considering the current funding environment. HUD’s proposed FY24 budget notes that there are 864 developments nationwide that may not have sufficient resources to address their escalating physical needs. The budget adds that REAC’s data identifies 650 developments representing over 114,000 units “with a limited remaining useful life with failing or trending to fail physical inspection scores.” If HUD continues with its current plans, it will require PHAs to correct more deficiencies in a shorter timespan under an adverse funding environment. Overall, REAC should rethink the inspection frequency to give properties with more deficiencies a reasonable amount of time to correct them. REAC should also provide specifics about how it will determine the frequency of inspections, as they have not been formally published yet.

Correction and Appeal Timeline

We understand that the defect correction timeline and defect appeal timeline will be published in later notices; however, we feel that both the correction and appeal timelines must be considered as

part of reviewing the scoring methodology. If the previously identified issues with the standards and scoring methodology are not addressed, then mitigation must be available through a generous timeline to address deficiencies or to appeal defects to recoup points.

Correction Timeline

For deficiencies that have a 30-day standard health/safety repair timeline, certain exceptions should be instituted. PHAs cannot paint the exteriors of structures during the winter for example. Exceptions to the correction timeline based on region and who/what caused the deficiency should be considered. Additionally, many 30-day health/safety deficiencies will reasonably exceed that timeframe given the variable availability of contractors and the length of time it takes for procurement. This is particularly true if the repair would be subject to the provisions of the Buy American, Build America (BABA) Act. Examples of repairs that regularly go beyond a 30-day timeframe are roofs, gutters, and sidewalks.

Appeal Timeline and Process

The process for appealing cited defects should be seamless and done through the online case management software provided by HUD. PHA staff should not need to spend time inputting duplicative information about the appeal when such information can be automatically pulled from the NSPIRE software. The process should afford PHA staff ample time to review inspection results and request appeals. We request that HUD allow for at least a 60-day deadline for PHAs to appeal any deficiencies to recoup points.

The process should also allow REAC staff ample time to adjudicate appeal requests. We recognize that REAC staff could be inundated with appeals to review, particularly during the early days of NSPIRE's rollout if HUD does not extend the implementation timeline. To avoid an administrative burden on REAC staff, we recommend that HUD set an internal timeframe for reviewing deficiency appeals. Under this scenario, if HUD does not respond to an appeal within that timeframe, the points would be automatically restored, thereby alleviating any potential administrative backlog at REAC.

Exception for Exigent Circumstances

HUD must also build in an exception to the correction timeline for natural disasters or other exigent circumstances. When a hurricane causes damage to a unit, it may be months before that unit is again ready to be occupied. Residents may be subject to evacuation orders as well. The PHA should be given ample time to make the necessary repairs without being penalized by REAC. Likewise, exceptions should be granted for material shortages and supply chain delays. As an ongoing consequence of COVID-19, CLPHA members report extensive delays that are beyond their control to procure certain maintenance items that have resulted in the unit being out of compliance. For items that are non-life-threatening, NSPIRE should afford property owners sufficient time to address unit deficiencies and grant extensions when appropriate.

Fail Thresholds for Units with 30+ Point Deductions

According to the proposed scoring methodology, if 30 points or more were deducted from one unit, the whole property would fail *even if the rest of the property were in pristine condition*. A single unit in poor condition at an otherwise well-maintained property should not cause that whole property to fail and receive a score of 59. A failed inspection would not be an accurate depiction of the property's overall condition. Some properties have one "problem unit" in which there are tenant-caused damages, and PHAs should not be penalized with failed inspections when the property is in otherwise great condition.

Technology and Software

CLPHA is concerned that HUD is prematurely setting an implementation timeline for NSPIRE while the technology is not reliable and ready for use nationwide. Members participating in the demonstration reported that issues with the software persist. In addition to concerns that large PHA software vendors are not ready to deploy software upgrades to integrate with NSPIRE, CLPHA members are concerned that the NSPIRE web-based platform is not ready for implementation.

Unreliable Software

NSPIRE demonstration participants report that the current test platform frequently fails in the field and requires inspectors to return to the office to upload inspection data manually. One of our members reported problems with the software's backend when attempting to submit case management-related documentation, and HUD's help desk did not resolve the issue. Others noted that the software was inconsistently pre-populating data used to classify properties for inspectors. Another PHA reported that it was unable to pre-load into the software that GFCIs in the property were all linked to a 'master GFCI', so the PHA had to explain it to the inspector on the day of the inspection. Even after explaining it to the inspector, the property lost points for every individual GFCI, which would have necessitated the PHA submit documentation to HUD to recoup the lost points after the inspection. If the software does not reliably allow PHA staff to submit documentation and pre-load property data prior to an inspection, it will create major administrative burdens for PHAs nationwide, leading to extra work for PHA staff and HUD alike.

Inadequate Software Training for Inspectors

While the software is based on Decision Trees designed to minimize the subjectivity of inspectors, our members reported that inspectors lacked adequate training on the software. Multiple inspectors were not trained on the software and were unsure of how it functioned. The inspectors often did not properly categorize properties pre-inspection and uploaded pictures that did not match the defects. HUD should provide inspectors with training on the software to ensure they can operate the web-based platform seamlessly.

NSPIRE Software Deficiency Reports

Several demonstration participants reported not receiving an auto-generated report of all 24-hour deficiencies at the end of the day of an inspection. Many PHAs rely on the auto-generated deficiency reports in the NSPIRE software to identify and respond to all 24-hour deficiencies. While some deficiency reports were uploaded within 48 hours of the inspection, others took an excessive amount of time to appear in the system. One of our members was still waiting *over a month* after an inspection for the property's deficiency report to be uploaded. PHA staff reported having to frequently login to the NSPIRE software to monitor for these reports to be posted. Any delays in deficiency reports appearing in the system will present major problems. A PHA will not be able to respond to all health and safety defects that must be corrected within 24 hours if the PHA does not receive the deficiency report at the end of the inspection day.

Incomplete Report-Out Functions

The report-out functions in the NSPIRE software are not user-friendly. Currently, the only exportable report is in PDF format, which is not helpful for agencies to analyze their data. Staff would have to spend hours pulling data from exported PDFs and moving it into Excel for analysis. The NSPIRE software must be upgraded to allow the export of data in Excel format for analysis and reporting.

Training and Staff Costs for PHAs

Although NSPIRE will operate as a web-based platform, PHAs will be forced to expend limited administrative resources to implement NSPIRE. These costs are not trivial, and HUD should acknowledge them and carefully consider the appropriate administrative funding needed prior to its implementation. HUD should also consider how the ongoing pandemic will make compliance difficult with HUD's timeline to implement NSPIRE in 2023. Increased labor costs and labor shortages are significant challenges to implementing NSPIRE efficiently and effectively in a relatively short period.

Hardware Costs

PHAs will be required to procure costly mobile technology (tablets and smartphones) to electronically submit inspection data to HUD. While some agencies have transitioned to paperless systems that may support this type of inspection model, many have not. Thus, PHAs will need to make large-scale technology investments in a relatively short period to comply with NSPIRE in 2023. Early in the demonstration, HUD provided PHA staff with free tablets and training on NSPIRE standards, guidance on inspection protocols, and how to use mobile technology to capture NSPIRE data. In the past, HUD provided devices to PHAs for inspection, but there are currently no plans to do so for NSPIRE. Supply chain delays and shortages continue to make it difficult to purchase electronic devices.

Software Costs

PHAs will incur high costs to implement the software for NSPIRE. PHAs will also need sufficient time to upgrade their PHA software to integrate with NSPIRE. CLPHA members have reported that their software vendors have not completed building the infrastructure needed to integrate with the NSPIRE software. Many vendors report they are awaiting the NSPIRE Final Rule before making upgrades to back-end technology. Normal PHA software system upgrades can take more than a year to fully launch, but our members are concerned that their vendors will need even more time to launch NSPIRE.

Staff and Contractor Costs

PHAs will incur significant staff/contractor retraining costs to implement NSPIRE. CLPHA members participating in the NSPIRE demonstration report that HUD's technical assistance and training have been inconsistently applied, requiring PHAs to expend significant staff resources. Likewise, some PHAs noted that they are currently burdened by inspection backlogs, and new inspection regulations will only exacerbate this burden if more time is not allowed to properly train staff/contractors. Additionally, CLPHA members expect that their third-party inspection contract costs will increase as contractors increase their fees to cover their staff retraining costs. Another consequence of the COVID-19 pandemic raised by our members is the shortage of qualified inspectors. Increased labor costs and labor shortages are significant challenges to implementing NSPIRE efficiently and effectively in a relatively short period.

Summary of Recommendations

1. Delay the implementation of NSPIRE beyond 2023 and until the challenges detailed in this letter are fully addressed.

It is not realistic or practical to implement NSPIRE in 2023. HUD has already allowed HCV participants to continue using an alternative inspection protocol for one year, so NSPIRE as a whole should be afforded this extension prior to implementation.

2. Allow PHAs a minimum of one year after NSPIRE's final rulemaking is completed prior to beginning NSPIRE inspections of record.

PHAs need additional time to obtain the required mobile technology, retrain/hire staff and contractors, upgrade PHA software, and adapt processes and procedures to deploy NSPIRE and NSPIRE-V.

3. Provide Advisory Scores During the Implementation Period

HUD should provide advisory scores during the implementation period. The first inspections of record should be at least 18-24 months after the effective date of the final rule.

4. Provide Demonstration Participants with Scores

Providing participants with their NSPIRE demonstration inspection scores will allow PHAs to properly evaluate the new Scoring Methodology.

5. Iterative Review of Scoring Methodology During Implementation

HUD should implement an iterative review process for the Scoring Methodology.

6. Provide More Time to Use the Score Calculation Tool

PHAs should be given more time to use the Score Calculator to evaluate roughly what their NSPIRE scores will be. This feedback should be used by REAC to make adjustments to the scoring methodology during the aforementioned iterative review process.

7. Provide clarity on the formula

HUD should provide greater clarity and examples of the mathematical formulas used in the scoring methodology, allowing PHAs and REAC to determine whether the Defect Weighting Table needs adjustment.

Thank you for the opportunity to comment on these most important regulations and their impact on the residents we serve.

Sincerely,



Sunia Zatterman
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Council of Large Public Housing Authorities