CHA Inspections: Get Ready for NSPIRE Part 1

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Agenda

- NSPIRE: What and Why
- Introduction to NSPIRE for Voucher Programs
- CHA Inspection Standards vs. NSPIRE
- Healthy Homes: Mold Management and Lead-Based Paint
- NSPIRE Inspectable Areas and Severity Ratings
- Online Resources
- Q&A

What is NSPIRE?

- National Standards for the Physical Inspection of Real Estate (NSPIRE)
  - Replaces Uniform Physical Conditions Standards (UPCS) for Public Housing and Multifamily Housing
  - Redefines Housing Quality Standards (HQS) for Housing Choice Voucher (HCV) Programs
    - HQS originally implemented by the Housing and Community Development Act of 1974
  - Prioritizes health, safety, and functional and structural defects
  - Puts the focus on the areas that impact residents the most
  - Goal is to align standards across HUD housing

Why the Change?

- Congress directed HUD to align inspection standards across all HUD-assisted properties
  - Economic Growth, Regulatory Relief and Consumer Protection Act
  - Final Rule — May 11, 2023
  - Final Standards — June 2023
- NSPIRE focuses on prioritizing resident health and safety
- NSPIRE is based on objective criteria to eliminate “gray areas”
- NSPIRE encourages proactive and preventative maintenance
- Implementing NSPIRE results in improved housing quality

NSPIRE for Voucher Programs

- NSPIRE changes the standards for inspections, not the policies within voucher programs
- CHA Inspection Standards (previously HQS) now defined by NSPIRE Standards:
  - New "Inspectable Areas" — Unit, Inside, Outside
  - New Determinations for Health and Safety Deficiencies
    - Life-Threatening – Severe – Moderate – Low
  - Focus on eight (8) critical areas:
    - Fire Safety
    - Infestation
    - Water Safety
    - Mold & Moisture
    - Carbon Monoxide
    - Lead-Based Paint
    - Structural
    - Habitability

NSPIRE for Voucher Programs

- NSPIRE Standards Updated Every Three (3) Years
  - Next update coming soon — end of 2026
- More Detailed and Consistent Inspection Process
- Comprehensive and Objective … Removes Subjectiveness
- Brings All HUD Housing (i.e., Public Housing, HCV) under One Set of Standards for Inspections
- Inspection Results Remain Pass/Fail

What to Expect

- All voucher programs must implement NSPIRE by February 1, 2027
- NSPIRE changes CHA Inspection Standards, not policies
  - Types of inspections (i.e., initial, periodic, interim, PBV turnover, etc.) remain the same
  - Frequency of inspections remain the same
  - Who conducts inspections (i.e., PHAs, Contractors, Independent Entities) remains the same
  - Inspections of voucher units remain pass/fail (no scoring)
  - HUD-approved variations are still allowed
  - Enforcement of Housing Assistance Payment (HAP) Contracts (for housing providers) is still required
  - Enforcement of Family Obligations (for voucher holders) is still required

What to Expect

- Correction Period Requirements
  - Life-Threatening Deficiencies — 24-hour Correction Period
  - Severe and Moderate Deficiencies — 30-day Correction Period
  - Low Deficiencies — No Follow-up Required

NSPIRE Changes in the Standards

- Four (4) Health and Safety Determinations:
  - Life-Threatening – Severe – Moderate – Low
    - All fails still result in a re-inspection
    - The determination level dictates the re-inspection time
    - A Low determination is noted but will not need to be re-inspected
- Three (3) Inspectable Areas:
  - Unit – Inside – Outside
- Eight (8) Critical Focus Areas:
  - Fire Safety – Infestation – Water Safety – Mold & Moisture – Carbon Monoxide – Lead-Based Paint – Structural – Habitability

How were the new standards developed?

- Under the NSPIRE inspection protocol, every cited property deficiency must explicitly tie back to a clear, foundational health, safety, or habitability risk. HUD categorizes these resident-centered justifications using specific alphanumeric codes.
- Deficiency rationales were used to create standards
  - Each deficiency has a clearly expressed and well-supported statement that explains why that deficiency is being inspected
  - Describes the potential impact if the issue were present at a property

How were the new standards developed?

Code	Category	Description
R1	Health	Condition could affect resident's mental, or physical, or psychological state.
R2	Safety	Resident could be injured because of this condition.
R3	Sanitary	Special sub-set of health hazards related to hygiene. Resident cannot clean or dispose of waste or does not have clean drinking water.
R4	Security	Resident cannot control access to unit or property because of this condition.
R5	Privacy	Condition limits the resident's reasonable expectation of privacy in their dwelling.
R6	Usability or Operability of Fixtures	Because of this condition, the resident is unable to use certain fixtures, features, or appliances, which are reasonably assumed to be part of their rent.
R7	Increased Monetary Impact to Resident	Resident would incur additional costs because of this condition.

What are the similarities between CHA Inspection Standards and NSPIRE?

- Similarities
  - The HCV Program is still the same
  - NSPIRE is an inspection protocol only
  - Frequency of inspection remains the same
  - Owner/Tenant responsibility as defined by the program
  - Focus on health and safety
  - Inspection scope
  - Pass/Fail (levels impact repair time)

What are the differences between CHA Inspection Standards and NSPIRE?

- Greater Emphasis:
  - More weight given to deficiencies occurring in the unit
  - Health, safety and functional defects
- Less Emphasis:
  - Areas where residents spend less time
  - Condition and appearance defects
  - Non-health and safety items
- Replaces “decent, safe, and sanitary, and in good repair” with “safe, habitable housing”

What are the differences between CHA Inspection Standards and NSPIRE?

- Objective deficiency criteria (significant increase in deficiency definitions)
- Adds affirmative habitability requirements
- Different inspectable areas
- Different approach – similar inspection
- Non-Industry Standards (NIS) repairs no longer applicable
  - How something looks doesn't necessarily correlate to health and safety or cause risk to the family
    - Example: Dissimilar floor tiles
    - Example: Overgrown vegetation that doesn't block egress or cause trip hazard

What are the differences between CHA Inspection Standards and NSPIRE?

- Life-Threatening Deficiencies
  - NSPIRE has 40 plus life-threatening deficiencies that can result in a 24-hour emergency re-inspection (there are only 15 emergency fail items under CHA Inspection Standards).
  - New emergency deficiencies that were not looked at in the past will now be reviewed.
  - Some items that are a routine fail in the current CHA Inspection Standards will be a 24-hour emergency when NSPIRE is implemented February 1, 2027.

What are the differences between CHA Inspection Standards and NSPIRE?

- Examples of New Life-Threatening Deficiencies
  - Call-For-Aid System
  - Clothes Dryer Exhaust Ventilation
  - Fire Extinguisher (tenant-owned fire extinguishers are not subject to inspection)
  - Sprinkler Assembly
  - Electrical — Conductor, Outlet and Switch
    - Visible wire nut
    - Open knockouts
    - Hardwire smoke alarm with an exposed conductor

What are the differences between CHA Inspection Standards and NSPIRE?

- Smoke Alarms
  - A required smoke alarm is [found to be] not hardwired or does not comply with the 10-Year Sealed Lithium Battery Rule
  - An extra, non-required smoke detector (e.g., a decorative or older extra alarm on a wall, ceiling) that is [found to be] non-functional, missing a battery or broken
- Mold
  - Cumulative area of patches is more than 9 square foot in a room.
  - Presence of mold-like substance at extremely high levels is observed visually.

NSPIRE Critical Smoke Detector Mandates

10-Year Sealed Lithium Battery Rule:
All stand-alone, solely battery-operated smoke alarms anywhere on the property MUST be powered by sealed, tamper-resistant, non-removable 10-year lithium batteries. Regular replaceable 9V or AA battery-operated units will fail immediately.

The 'Extra Detector' Trap:
If a property owner installs an extra, non-required smoke detector (e.g., a decorative or older extra alarm on a wall), and that detector is found to be non-functional, missing a battery or broken, it is automatically cited as a **Life-Threatening Deficiency**. If it is present, it must work. Remove unneeded extra detectors before the inspector arrives.

CHA's Healthy Homes Team

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Who are we?

- 8 staff + 1 director; joined CHA in Spring/Summer 2025
- Three programs:
  - **Healthy Homes**
    - Primary focus: Management of lead-based paint, asbestos, mold hazards & indoor air quality
  - **Sustainability**
    - Primary focus: Make homes more resilient by leveraging resources to reduce resident energy use and costs
  - **NEPA – National Environmental Policy Act**

Email: healthy_homes@thecha.org

Web: https://www.thecha.org/resident-services/resources-families-and-seniors/healthy-homes

WATER DAMAGE & MOISTURE MANAGEMENT

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Water Damage Control + Mold Prevention Tips

- **STOP THE WATER: dry spills, safely clean flood water, stop leaks**
- **Maintain low indoor humidity**
  - Below 60% Relative Humidity (RH) (Ideally between 30-50% RH, if possible)
    - **How?**
      - Vent moisture-generating appliances to the outside
      - Run fans or open windows as appropriate: showering, cooking, etc.
      - Use air conditioners or dehumidifiers

Do

- **Fix all leaks, floods and broken pipes** as soon as possible.
  - If the problem seems too complicated to fix, seek the help of a professional.
- **Clean visible mold** in small areas with soap and water as soon as possible.
  - Use a microfiber mop or cloth if possible.
  - Wear an N-95 mask, goggles without ventilation holes and gloves when cleaning.
- **On windy or rainy days** keep windows closed to ensure moisture does not enter your home.
- **Increase ventilation in damp rooms** like your bathroom by using fans and keep the door and/or window open when not in use.
- **The EPA recommends** drying damp spaces within 24-48 hours of becoming wet.

Don't

- **Don't allow moist, dark and/or humid spaces in your home**:
  - This is the mold triple- threat!
- **Do not attempt to clean** visibly moldy spaces larger than 3 ft. x 3ft. Jobs this big require a trained professional.
- **Do not use bleach** or mix bleach with other household cleaning products when cleaning.
- **Don't paint over moldy surfaces** without completely cleaning and thoroughly drying them first.

Based on MN Dept of Health & EPA R5 slides

LEAD-BASED PAINT

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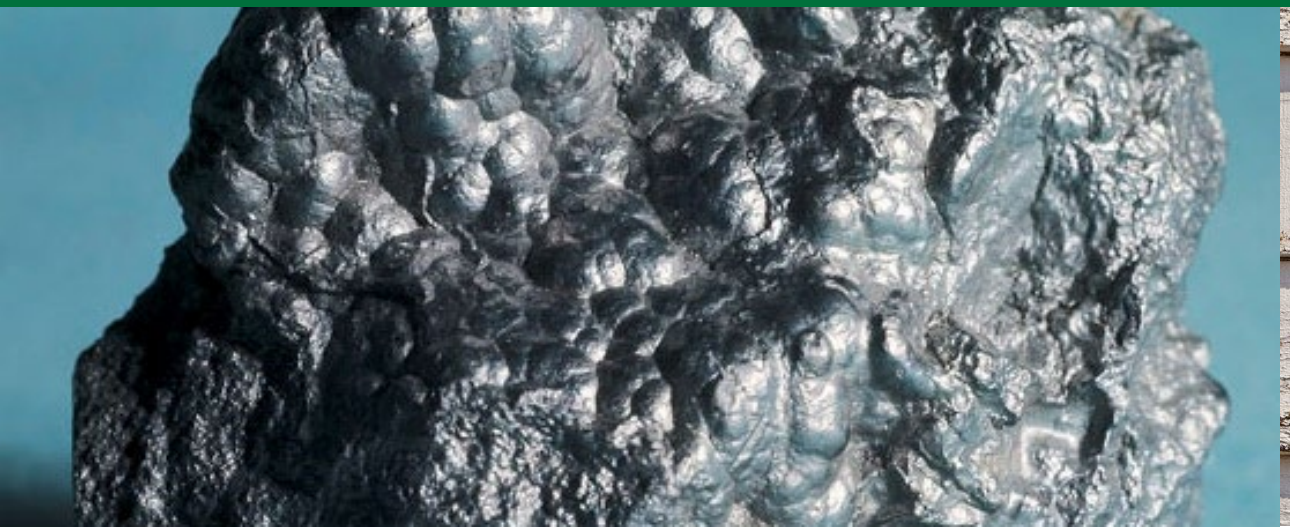
What is lead?

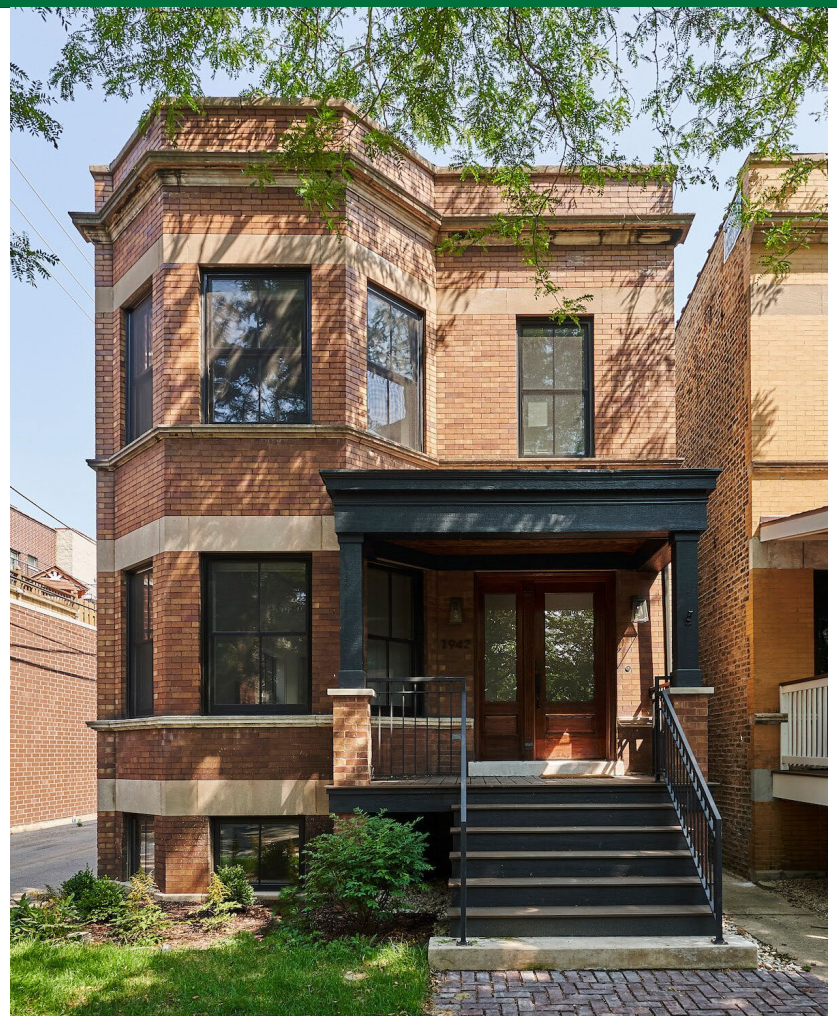


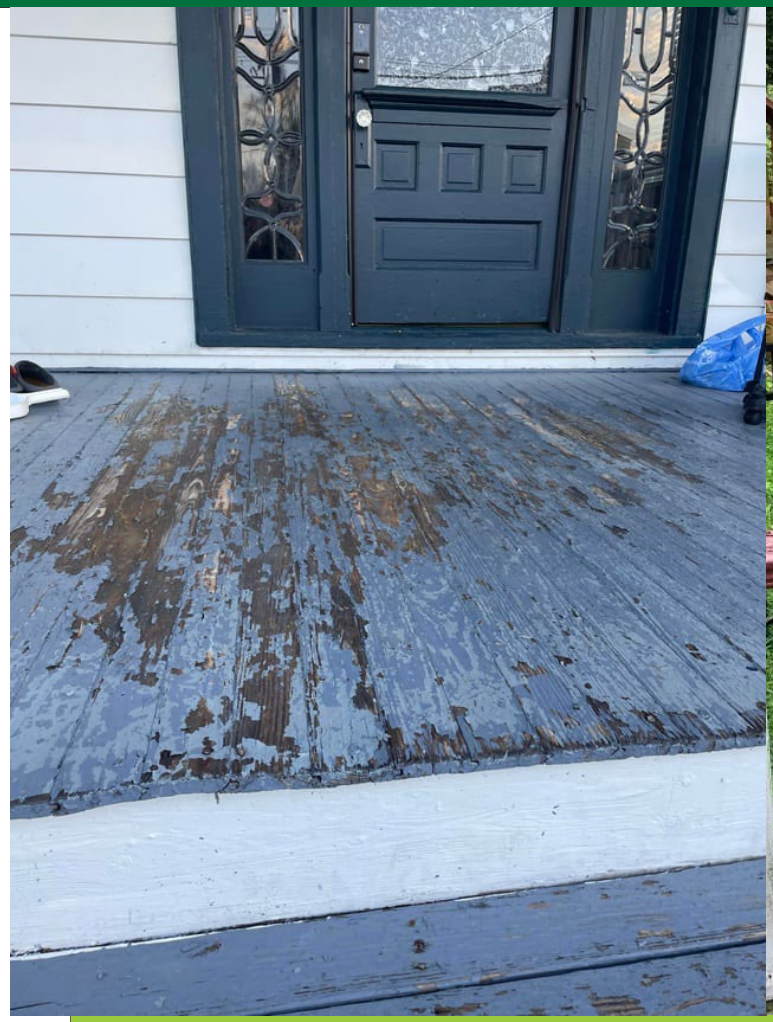
- Bluish-gray metal found in the earth's crust, that is toxic to humans even in small amounts.
- Does not degrade in our environment over time.

What is Lead-Based Paint?

- Widespread use in older homes built before 1978.
- Proven to be hazardous as it chips and dust scatters, predominantly affecting the health of children

Where is LBP found?





Why does this matter?

According to the EPA and CDC,
there is no safe level of lead exposure for children.

Lead & children

- Behavioral issues
- Learning disabilities
- Lower IQ
- Hyperactivity
- Slowed growth
- Hearing problems
- Anemia
- & more

RRP RULE: Renovation, Repair, & Painting

HUD Lead Safe Housing Rule & EPA RRP Rule: Requires any work that disturbs more than 2 sq. ft. of an interior room's painted surface or 10% of any one component in in a pre-1978 residence to be conducted by a Lead-Safe Certified contractor.

What you need to know:

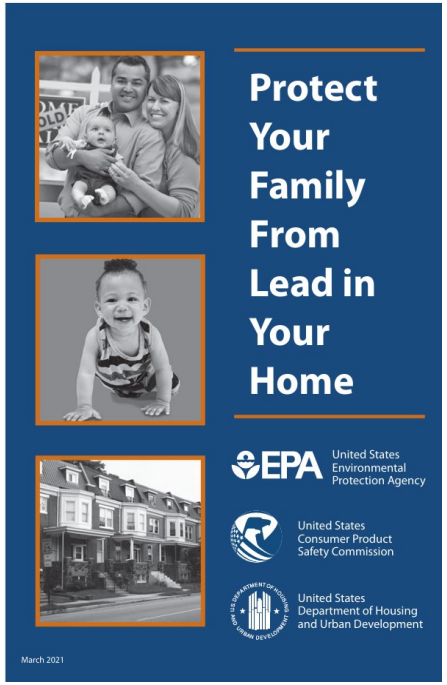
- If you are conducting DIY work on a property you rent out, **you must be Lead-Safe Certified** (take a course for Renovation, Repair & Painting)
- Find a certifying course here: https://cdxapps.epa.gov/ocspp-oppt-lead/training-search
- If you are hiring a contractor for your property, **you must hire a Lead-Safe Certified worker**
- Find a certified professional here: https://cdxapps.epa.gov/ocspp-oppt-lead/firm-location-search/distance

For more information, visit: www.epa.gov/lead/lead-renovation-repair-and-painting-program

DISCLOSURE RULE

Before signing a lease, this rule requires lessors of housing built before 1978 to:

1. Disclose **any known information** pertaining to lead-based paint in the property;
2. Provide a copy of the **Protect Your Family** pamphlet;
3. Provide a "**Lead Warning Statement**" informing of the health risks of lead exposure



What you need to know:

- Looking to inspect for, remove, or address lead hazards? Hire state-licensed abatement professionals.
- All other renovations: follow RRP requirements

City of Chicago Lead Hotline:
312.747.LEAD (312-747-5323)

https://www.epa.gov/lead/lead-based-paint-disclosure-rule-section-1018-title-x

NSPIRE Inspectable Areas

NSPIRE establishes three areas for inspection: Unit, Inside and Outside — increasing the usability of the standards and streamlining the inspection process.

Photos By: HUD Flickr

Unit

- Interior components of an individual dwelling where the resident lives

Inside

- Common areas and building systems within the building interior that are not inside a unit

Outside

- Building site, building exterior components, and any building systems located outside of the building or unit

NSPIRE Inspectable Areas

- Each standard identifies the inspectable areas where the standard is located
  - Some standards are only applicable to one area
  - Typically, most standards are applicable to multiple areas

NSPIRE Inspectable Areas

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
NSPIRE
NATIONAL STANDARDS FOR THE PHYSICAL INSPECTION OF REAL ESTATE

NATIONAL STANDARDS FOR THE PHYSICAL INSPECTION OF REAL ESTATE

TITLE: ADDRESS AND SIGNAGE

VERSION: V2.2

DATE PUBLISHED: 06/23/22

Location

DEFINITION: Unique number and name identifiers assigned to the property.

PURPOSE: Assist in identifying and locating the property.

COMMON COMPONENTS: Arabic numerals; Alphabetical letters; Frame; Mounting; Protective enclosures; Lighting component

LOCATION:			
	☐	Unit	None
	☐	Inside	None
	☒	Outside	Near building entrances (either above or alongside the entrance or on a nearby post) and road entrances where the property's private road meets a public road.

MORE INFORMATION: None

DEFICIENCY 1:	Address, signage, or building identification codes are broken, illegible, or not visible.	
LOCATION:	☒	Outside

NSPIRE Severity Ratings

Health & Safety Designation	Correction Timeframe (P/F)
LT	**Life-Threatening - 24 Hours (Fail)**
S	Severe - 30 Days (Fail)
M	Moderate - 30 Days (Fail)
L	Low - N/A (Pass)

NSPIRE Severity Ratings

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

NSPIRE Severity Ratings

- Severe
  - Deficiencies that, if evident in the home or on the property, present a high risk of:
    - Permanent disability, or serious injury or illness, to a resident
    - The physical security or safety of a resident or their property would be seriously compromised

NSPIRE Severity Ratings

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

NSPIRE Severity Ratings

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

Online Resources

- Scan the QR code to access more information about CHA Inspections, including links to the following NSPIRE Resources:
  - HUD NSPIRE Home Page
  - NSPIRE Standards
  - NSPIRE Inspectable Areas
  - NSPIRE HCV/PBV Inspection Checklist
  - HUD Exchange NSPIRE Trainings and Resources
  - HUD Exchange Online Inspector Training

Questions?

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