



Submitted via email to OIRA_Submission@omb.eop.gov

To: HUD Desk Officer, Office of Management and Budget, New Executive Office Building,
Washington, DC 20503

Date: June 6, 2019

RE: [Docket No. FR-7011-N-21] Notice of Emergency Approval of an Information Collection:
National Standards for the Physical Inspection of Real Estate (NSPIRE) Demonstration. OMB Approval
Number: 2577- Pending

Thank you for the opportunity to comment on your May 23 emergency information collection announcement.

The mission of [LeadingAge](#) is to be the trusted voice for aging. Our 6,000+ members and partners include nonprofit organizations representing the entire field of aging services, 38 state associations, hundreds of businesses, consumer groups, foundations and research centers. LeadingAge is also a part of the Global Ageing Network, whose membership spans 50 countries. LeadingAge is a 501(c)(3) tax-exempt charitable organization focused on education, advocacy and applied research.

As early and consistent participants in HUD/stakeholder working groups on the Real Estate Assessment Center (REAC) physical inspection protocol, LeadingAge supports HUD's efforts to ensure resident housing is decent, safe, sanitary and in good repair. Our members are committed to providing quality affordable housing to older adults and serving as stewards of valuable national resources provided to that end.

We appreciate that prior to launching the National Standards for the Physical Inspection of Real Estate (NSPIRE) model HUD plans to test it through a voluntary demonstration, to ensure that the standards, protocols, and processes meet the goal of ensuring the best and safest housing for residents.

We offer specific comments on each of the four questions in the May 23 announcement, detailed below. In addition, we caution that housing providers are diverse in terms of size, staffing, and management. We urge HUD to review the demonstration protocol to ensure that this diversity is considered so that demonstration results will be applicable to the range of providers.

Responses to the Four Questions in the May 23 Solicitation

(1) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;

LeadingAge response: Data collection intended to help HUD understand owner compliance and ensure the quality of the housing for residents is necessary for the new inspection model to function properly.

(2) The accuracy of the agency's estimate of the burden of the proposed collection of information;

LeadingAge response: Owners are not created equal and average burden per response will vary significantly between large providers with a broad national footprint compared to smaller providers who may lack staff time, capacity, and the systems needed to generate and/or transmit documentation. For example, larger providers with sites in different locations may have difficulties reconciling submission of code violations, which vary by locality.

Housing providers that have individually or corporately invested in technologies and organizational staffing patterns to facilitate the collection and/or transmission of such data as HUD is seeking are concerned about what this demonstration may mean for their technology and systems investments. Will HUD be able to collect information provided from a range of existing software systems, or will HUD solely require use of a specific software? This could significantly impact time and cost of reporting as well.

(3) Ways to enhance the quality, utility, and clarity of the information to be collected;

LeadingAge response: Smaller operations have indicated that their ability to collect, scan and share desired documentation electronically may be problematic. They are concerned about having staffing availability for the time it would take to scan and compile all other profile data, building systems certifications, and local code violations, as applicable. We have been told by at least one smaller provider that they would face challenges due to lack of computer hardware, facility with new software, or even internet speed or connection capacity, but we do not know the scope of such challenges with other providers nationwide.

As certificates expire at all different times of the year, does HUD intend owners to be constantly submitting updates via the portal? LeadingAge suggests that HUD should evaluate the importance of collecting actual documents and consider whether having the capacity to review them onsite and/or receive periodic owner statements verifying the existence and/or date/s of validity of appropriate certifications as needed could be better achieved through HUD-developed checklists.

We question whether the collection of floorplans is useful and suggest instead that HUD collect information about square footage.

(4) Ways to minimize the burden of the collection of information on those who are to respond; including the use of appropriate automated collection techniques or other forms of information technology (e.g., permitting electronic submission of responses).

LeadingAge response: We believe it is important that HUD consider ways to engage a wide variety of provider types and capabilities as part of this inspection demonstration and data collection effort.

One of our larger members indicated they would be happy to share their actual inspection data as collected, which also tracks the resolution of work orders that may have been generated at the time of the inspection. However, they caution that it is very important they be able to use their own existing self-inspection software. They do not want to require maintenance staff to utilize two different types of inspection programs and software. This larger member supports the initiative to submit annual inspections, given it can be provided at any point during a 12-month period.

We urge HUD to engage volunteers to explore the reporting that is already available and consider collecting consolidated reports where possible instead of individual documents from individual sites.

Collection of inspection data and/or work orders may present challenges to some smaller entities where processes are manual (paper-driven) and staffing is not sufficiently available to collect, scan and submit electronically all background that HUD may hope to receive via this portal. Even the offer to provide software does not guarantee that smaller operators will be able to easily engage with HUD in this demonstration.

Again, we thank you for the opportunity to provide these comments. Should you have any questions, please do not hesitate to contact Colleen Bloom, Director of Housing Operations, at 202 508-9483 or cbloom@leadingage.org

We hope our comments will help HUD to refine the inspection demonstration and help develop a reasonable and effective standard. We look forward to continuing to engage with HUD on this important issue.