Summary of Key Provisions of the Final National Standards for Physical Inspection Regulation (NSPIRE)

Ed Gramlich, National Low Income Housing Coalition, May 2023

General Summary

HUD published the <u>final rule</u> implementing the National Standards for Physical Inspection of Real Estate (NSPIRE) in the *Federal Register* on May 11. A <u>proposed rule</u> was published on January 13, 2021 with NLIHC submitting <u>comments</u> on March 22, 2021. NSPIRE seeks to strengthen HUD's physical condition standards and improve HUD oversight. It aligns, consolidates, and improves in regulation at 24 CFR part 5, the physical inspection regulations that apply to multiple HUD-assisted housing programs, replacing Uniform Physical Condition Standards (UPCS) and absorbing much of the Housing Quality Standards (HQS) regulations.

NSPIRE physical inspections will focus on three areas: the housing units where HUD-assisted residents live, elements of their building's non-residential interiors, and the outside of buildings, ensuring that components of these three areas are "functionally adequate, operable, and free of health and safety hazards."

The new inspection protocol will start on July 1, 2023 for public housing and on October 1, 2023 for the Housing Choice Voucher (HCV) program, the various programs of HUD's Office of Multifamily Housing Programs, and the various housing programs overseen by HUD's Office of Community Planning and Development (CPD).

NSPIRE applies to all HUD housing previously inspected by HUD's Real Estate Assessment Center (REAC), including Public Housing and Multifamily Housing programs such as Section 8 Project-Based Rental Assistance (PBRA), Section 202 Supportive Housing for the Elderly, Section 811 Supportive Housing for Persons with Disabilities, and FHA Insured multifamily housing. NSPIRE also applies to HUD programs previously inspected using the Housing Quality Standards (HQS) regulations: the HCV program (including Project-Based Vouchers, PBVs) and the CPD programs – HOME Investment Partnerships (HOME), national Housing Trust Fund (HTF), Housing Opportunities for Persons with AIDS (HOPWA), Emergency Solutions Grants (ESG), and Continuum of Care (CoC) homelessness assistance programs.

Further information will be provided in three "Subordinate Notices."

- HUD proposed an NSPIRE Standards notice on June 17, 2022, focusing on health and safety physical inspection standards. The final Standards notice will be issued in the *Federal Register* and will be effective before HUD begins NSPIRE inspections. It will be updated every three years and published for comment in the *Federal Register*.
- HUD also <u>proposed an NSPIRE Scoring notice</u> on March 28, 2023. The final Scoring notice will be issued in the *Federal Register* and will be effective before HUD begins NSPIRE inspections. It will be updated every three years and published for comment in the *Federal Register*.

• HUD did not provide an NSPIRE Administrative notice for comment, but will publish a final Administrative notice before July 1, 2023. It will outline the NSPIRE process for inspections, submitting evidence that "Life-Threatening" and "Severe" deficiencies have been corrected, other administrative requirements, and the process for gathering resident feedback on property conditions. NLIHC is concerned that residents and advocates will not be able to comment on the process of gathering resident feedback regarding property conditions.

HUD's Office of Community Planning and Development (CPD) will issue separate notices ("CPD NSPIRE notices") before October 1, 2023, to implement the rule for the individual CPD programs, which generally do not adopt the methods in the three Subordinate Notices.

HUD will also issue a notice to provide guidance for the Small Rural PHA Public Housing Assessment System (PHAS) and Section Eight Management Assessment Program (SEMAP) scoring processes.

The Need for the Rule

Housing Quality Standards (HQS) were developed in the 1970s and Uniform Physical Condition Standards (UPCS) were developed in the 1990s. In recent years HUD found that both inspection models sometimes provide inaccurate and inconsistent results. NLIHC notes that advocates have found some properties in very bad condition receive passing physical condition scores (Real Estate Assessment Center, REAC scores), while other properties in good condition receive low scores.

HUD has also identified a disproportionate emphasis on physical inspections around the appearance of items that were otherwise safe and functional, while inadequate attention was paid to the health and safety conditions. HUD concluded that existing housing standards needed to focus on habitability and the residential use of structures, and most importantly, the health and safety of residents.

NSPIRE Background

HUD sought PHAs and owners of private HUD-assisted multifamily properties in 2019 to volunteer for its REAC pilot project named National Standards for the Physical Inspection of Real Estate (NSPIRE). According to a *Federal Register* notice, on August 21, 2019, over the course of two years HUD sought to inspect 4,500 properties willing to voluntarily adopt the NSPIRE model. A list of properties approved to participate in NSPIRE is at: https://bit.ly/3q9ai1k

The NSPIRE demonstration model had three major components:

• Three types of inspections: 1) self-inspections by PHAs and owners and agents of private, HUD-assisted multifamily housing, 2) inspections conducted by contractors and/or federal inspectors, and 3) inspections conducted solely by federal inspectors. HUD would inspect participating properties at least once during the demonstration using the NSPIRE standards.

- Three categories of physical deficiencies: 1) health and safety, 2) function and operability, and 3) condition and appearance. HUD stated that ideally each category could result in emergency work orders, routine work orders, and other maintenance.
- Three inspectable areas: 1) inside (common areas and building systems), 2) outside (building site and building envelope), and 3) units (the interior of an individual home).

Highlights of the Proposed Rule

Housing quality regulations across multiple HUD programs are consolidated into one location at 24 CFR part 5. However, these regulations "may" be supplemented by program-specific regulations, such as those pertaining to the frequency of inspections, who performs the inspections, and whether alternative inspections are available. When there is a conflict between 24 CFR part 5 and program-specific regulations, the program-specific regulations govern.

Most of the alignment of inspection protocols, processes, and procedures involve Public Housing and the Multifamily programs: Section 8 Project-Based Rental Assistance (PBRA), Section 202 Supportive Housing for the Elderly, and Section 811 Supportive Housing for Persons with Disabilities. Also included are various programs that involve housing with mortgages insured or held by HUD or that receive HUD assistance, such as Section 221(d)(3) BMIR and Section 236.

The final rule aligns to the maximum extent possible, the Housing Choice Voucher (HCV) programs – Tenant-Based Vouchers (TBVs) and Project-Based Vouchers (PBVs) – which previously used Housing Quality Standards (HQS). Because they previously pointed to HQS, programs administered by HUD's Office of Community Planning and Development (CPD) are also included in the final NSPIRE rule. Those CPD programs include: HOME Investment Partnerships (HOME), national Housing Trust Fund (HTF), Emergency Solutions Grants (ESG), Housing for Persons with AIDS (HOPWA), and Continuum of Care (CoC).

NSPIRE physical inspections will focus on three areas: the housing units where HUD-assisted residents live, elements of their building's non-residential interiors, and the outside of buildings, ensuring that components of these three areas are "functionally adequate, operable, and free of health and safety hazards."

Summary of Key Final NSPIRE Provisions

Page numbers in the following are based on the <u>preview version</u> of the final rule. The <u>formal</u> <u>Federal Register version</u> was published on May 11, 2023. NLIHC has prepared <u>comparison</u> of key <u>recommendations it wrote</u> regarding the proposed NSPIRE rule with the final rule and the HUD's responses to NLIHC's recommendations. *This summary does not include all provisions* of the final rule.

Section 5.701, Applicability (page 164)

HUD amended Section 5.701 of the HUD regulations (at 24 CFR part 5) by extending the applicability of the current rule beyond Public Housing, Section 8 Project-Based Rental Assistance (PBRA), Section 202, and 811 as well as housing with mortgages insured or held by HUD or receiving insurance from HUD. The extended applicability includes the Housing Choice Voucher (HCV) program, covering both Tenant-Based Vouchers (TBVs) and Project-Based Voucher (PBVs). Housing programs administered by HUD's Office of Community Planning and Development (CPD) are also adopting these standards by reference in the applicable CPD program regulations that apply to: HOME Investment Partnerships Program (HOME), national Housing Trust Fund (HTF), Housing Opportunities for Persons with AIDS (HOPWA), Emergency Solutions Grants (ESG), and Continuum of Care (CoC).

Section 5.703, National Standards for the Condition of HUD Housing (page 166)

§5.703(a) General

NSPIRE physical inspections will focus on three areas: the housing units where HUD-assisted residents live, elements of their building's non-residential interiors, and the outside of buildings, ensuring that components of these three areas are "functionally adequate, operable, and free of health and safety hazards."

The standards in this section apply to all HUD housing. However, for HCV- and PBV-assisted housing the standards only apply to: a subsidized unit itself; items and components within the primary and secondary means of exit from a unit's entry door(s) to a public way; common areas related to residential use (such as laundry room and mail room); and the systems equipment that directly services a subsidized unit.

§5.703(b) Inside

Inside (or "inside areas") refers to the *common areas* and *building systems* generally found within a residential building's interior that are not inside a unit. Some examples of *common areas* in the final rule include: halls, corridors, stairs, community rooms, daycare rooms, laundry rooms, trash collection areas, basements, utility rooms, mechanical rooms, shared kitchens, and offices. Some examples of *building* systems include: components that provide electricity and water to units, elevators, fire protection, HVAC, and sanitary services.

Affirmative Requirements – Inside Areas

Each of the three inspection areas have "affirmative requirements." The preamble to the final rule states that additional detail about the affirmative requirements will be provided in the NSPIRE Standards notice and the NSPIRE Administrative notice. (page 9)

The inside area must meet six affirmative requirements:

- 1. There must be at least one battery-operated or hard-wired smoke detector, in proper working condition, on each level of a property.
- 2. The inside area of a building must meet or exceed the carbon monoxide detection standards set by HUD through a *Federal Register* notice. (Does not apply to housing with a mortgage insured or held by HUD, or Section 202 direct loan housing.)
- 3. Any outlet installed within six feet of a water source must be "ground-fault circuit interrupter" (GFCI) protected.
- 4. Must have a guardrail when there is an elevated walking surface with a drop off of 30 inches or more.
- 5. Must have permanently mounted light fixtures in any kitchen and in each bathroom.
- 6. May not have unvented space heaters that burn gas, oil, or kerosene.

§5.703(c) Outside (page 167)

Outside (or "outside areas") refers to a *building site*, building exterior components, and any building systems located outside of a building or a unit. Some examples in the final rule include: mailboxes, walkways, lighting, roads, parking lots, storm drainage, fencing, grounds, refuse disposal, play areas and equipment, and non-dwelling buildings. *Components on the exterior* of a building are also considered outside areas; some examples in the final rule include, doors, fire escapes, lighting, roofs, walls, windows, foundations, and attached porches.

Affirmative Requirements – Outside Areas

- 1. Outlets installed within six feet of a water source must be "ground-fault circuit interrupter" (GFCI) protected.
- 2. Must have a guardrail when there is an elevated walking surface with a drop off of 30 inches or more.

§5.703(d) Units, see next page

§5.703(d) Units (page 167)

A unit (a dwelling unit) refers to the interior components of a household's home. Some examples in the final rule include: bathrooms, kitchen, doors, windows, floors, ceiling, stairs, electrical systems, lighting, switches, electric outlets, HVAC, water heater, smoke detectors, and carbon monoxide devices.

Affirmative Requirements – Units (page 168)

The dwelling unit must meet eleven affirmative requirements:

- 1. Must have hot and cold running water in bathrooms and in the kitchen, including an adequate source of safe drinking water in bathrooms and the kitchen.
- 2. Must have its own bathroom "or sanitary facility" (undefined) that is in proper working condition and usable in privacy. A bathroom must have a sink, a bathtub or shower, and an interior, flushable toilet.
- 3. Must have at least one battery-operated or hard-wired smoke detector in proper working condition in the following locations:
 - a. On each level of a unit
 - b. Inside each bedroom
 - c. Within 21 feet of any door to a bedroom
 - d. On the living area side of a door that separates the living area from a smoke detector outside of a bedroom

There are three other provisions under 5.703(d)(3)

- 4. Must have a living room. It must also have a kitchen area that has a sink, cooking appliance, refrigerator, food preparation area, and food storage area.
- 5. For HCV or PBV units, there must be at least one bedroom or "living/sleeping room" for each two people. (NLIHC opposes allowing people to sleep in a living room.)
- 6. Must meet or exceed the carbon monoxide detection standards set by HUD through a *Federal Register* notice. (Does not apply to housing with a mortgage insured or held by HUD, or Section 202 direct loan housing.)
- 7. Must have two working outlets or one working outlet and a permanent light in all habitable rooms.
- 8. Outlets installed within six feet of a water source must be "ground-fault circuit interrupter" (GFCI) protected.
- 9. In HUD-designated geographies, must have a permanently installed heating source, and no units may have unvented space heaters that burn gas, oil, or kerosene.
- 10. Must have a guardrail when there is an elevated walking surface with a drop off of 30 inches or more.
- 11. Must have a permanently mounted light fixture in the kitchen and each bathroom.

§5.703(e) Health and Safety Concerns (page 169)

In general, a unit, the inside, and the outside must be free of health and safety hazards that pose a danger to residents. Types of health and safety concerns include: lead-based paint, mold, carbon monoxide, electrical hazards, flammable materials or other fire hazards, infestation, garbage and debris, structural soundness and extreme temperature. Housing must comply with all requirements related to the evaluation and control of lead-based paint hazards and have available documentation that the housing is in compliance. See 24 CFR part 35.

§5.703(f) (page 170)

The NSPIRE standards do not supersede state and local housing codes (such as fire, mechanical, plumbing, carbon monoxide, property maintenance, or residential code requirements). All HUD housing (except for HCV and PBV units) must comply with state or local housing codes, but compliance with state or local codes does not determine whether a unit passes HUD standards for HCV or PBV units.

Section 5.705, Inspection Requirements (page170)

§5.705(a) Procedures

The entity inspecting a property/unit must identify each deficiency as "Life-Threatening," "Severe," "Moderate," or "Low" (as defined in the NSPIRE Scoring notice).

The March 28, 2023 proposed NSPIRE Scoring notice definitions are:

- Life-Threatening (LT): there is a high risk of death, severe illness, or injury to a resident.
- Severe:
 - There is a high risk of permanent disability or serious injury or illness to a resident.
 - There are deficiencies that would seriously compromise the physical security or safety of a resident or their property.
- Moderate:
 - There is a moderate risk of an adverse medical event requiring a healthcare visit, causing temporary harm, or if left untreated causing or worsening a chronic condition that may have long-lasting adverse health effects.
 - There are deficiencies that would compromise the physical security or safety of a resident or their property.
- Low: There are deficiencies critical to habitability but do not present a substantive health or safety risk.

For HCV and PBV, HUD may approve inspection criteria variations that apply standards in local housing codes or other codes developed by a PHA [\$5.705(a)(3)(i)(A)], and that reflect local climate or geographic conditions [\$5.705(a)(3)(i)(B)]. HUD will not approve any inspection criteria variation that is likely to adversely affect household health or safety, or that severely restricts housing choice, \$5.705(a)(3)(ii). (page 171)

§5.705(b) Entity Conducting Inspections (page 171)

This subsection describes details regarding which entity is responsible for performing inspections according to various formal provisions. Public housing agencies (PHAs) must inspect HCV and PBV units.

§5.705(c) Timing of Inspections (page 172)

§5.705(c)(1) General

A property must be inspected before it is approved for participation in any HUD housing program.

§5.705(c)(2), Extended Inspection Cycle (pages 172-173)

<u>Standard 1 Performing Property</u> receives an NSPIRE score of 90 points or more. It will be inspected once every three years.

<u>Standard 2 Performing Property</u> receives an NSPIRE score of 80 points or more but fewer than 90 points. It will be inspected once every two years.

<u>Standard 3 Performing Property</u> receives an NSPIRE score of less than 80 points. It will be inspected annually.

HCV units must be inspected by a PHA every two years. (24 CFR 982.405)

PBV properties must have a sample of units inspected by a PHA every two years. (24 CFR 983.101)

Small rural PHAs and other small PHAs are to be inspected every three years. (See more about Small rural PHAs at the end of this summary on page 12).

§5.705(f) Tenant Involvement in Inspections (page 174)

"HUD will establish, through notice, a procedure for tenants to recommend to HUD particular units which HUD may choose to inspect either during or separate from its standard inspection. HUD will evaluate the condition of these units and issue a report on findings, but they will not be included in the official score unless they were randomly selected independent of the tenant's recommendation. The owner or PHA is required to correct any deficiency HUD identifies within the timeframes HUD has established for the identified deficiency."

(NLIHC comments that a procedure for tenants to recommend units for inspection should have been devised, with input from tenant organizations, along with the final NSPIRE rule. This was discussed early in the NSPIRE demonstration and tenant organizations have been urging this even before the NSPIRE demonstration was created. Any tenant-suggested units should be included in the scoring.)

Section 5.707, Uniform Self-Inspection Requirement and Report (page175)

All PHAs and owners (except for owners of HCV and PBV properties) must self-inspect all assisted units and their properties annually to ensure units meet the §5.703 standards. Owners and PHAs must maintain the results of a self-inspection for three years and must provide the results to HUD upon request. This self-inspection is independent of the HUD inspections in §5.705.

The process for performing self-inspections will be in the NSPIRE Administrative notice that will be published without opportunity for comment. (page 15)

Section 5.709, Administrative Process for Defining and Revising Inspection Criteria (page 175)

HUD will publish in the *Federal Register*, a Standards notice that has a list of deficiencies and the relative severity of these deficiencies to use for inspecting HUD-assisted housing. This *Federal Register* document will also include the factors for determining whether an HCV or PBV unit passes or fails the inspection. It will also include the date on which the Standards notice becomes effective.

HUD will publish in the *Federal Register*, a Scoring notice containing the methods to use for scoring and ranking HUD-assisted housing and the date on which the Scoring notice becomes effective.

HUD will update the Standards and Scoring notices, including any proposed revisions, every three years. These updates will be published in the *Federal Register* and open to public comment for 30 days.

Section 5.711, Scoring, Ranking Criteria, and Appeals (page 176)

§5.711(a) Applicability

§5.711 does not apply to HCV or PBV. PHAs that administer HCV and PBV will be assessed under the Section Eight Management Assessment Program (SEMAP) or the small rural PHA assessment according to 24 CFR 985.

§902.101 defines a small rural PHA as one that has 550 or fewer public housing units and/or HCV units in total, and either the PHA's primary administrative building or 50% of its combined public housing and/or voucher units are in a rural area as defined at 12 CFR 1026.35(b)(2)(iv)(A). (page 201)

§902.103(a) small rural PHAs shall be assessed and scored based only on the physical condition of their public housing properties in accordance with 24 CFR part 5. (page 202)

§902.103(b) public housing of small rural PHAs shall be assessed every three years, except "troubled" small rural PHAs shall be assessed annually.

§985.201, Small, rural PHAs are no longer subject to SEMAP requirements; instead they must follow other provisions at §985.203-211. (page 216)

Note: The final NSPIRE rule adds a new §902 subpart H dealing with small rural PHAs. See the end of this summary on page 12.

§5.711(b)(2) Public Housing Programs

PHAs operating public housing will be scored and ranked under the Public Housing Assessment System (PHAS) as outlined in 24 CFR part 902.

§5.711(c) Inspection Report Requirements (page 177)

§5.711(c)(1) Life-Threatening Deficiencies and Severe Deficiencies

REAC staff (or other appropriate party) will provide a notice to an owner or PHA indicating any items classified as "Life-Threatening" or "Severe" deficiencies.

- All Life-Threatening deficiencies must be corrected within 24 hours.
- All Severe deficiencies must be corrected within 24 hours.

The preamble indicates that additional information will be in the NSPIRE Standards notice and the NSPIRE Administrative notice addressing situations requiring additional time for a licensed professional or for needed supplies that may not be available in the 24-hour timeframe (page 17).

Within two business days after the 24-hour deadline to correct Life-Threatening and Severe deficiencies, an owner or PHA must electronically certify that the Life-Threatening and Severe deficiencies "have been resolved or sufficiently corrected such that they no longer pose a severe health or safety risk to residents of the property or that the hazard is blocked until permanent repairs can be completed."

§5.711(c)(2) Post-Report Inspection

An owner or PHA must review an NSPIRE inspection report and is responsible for conducting its own survey of the total property.

- Moderate deficiencies must be corrected within 30 days.
- Low deficiencies must be corrected within 60 days.

If a property received an NSPIRE score of 60 or more, the survey "may "be limited to inspecting for deficiencies based on inspection findings. If a property received an NSPIRE score less than 60, an owner or PHA must survey the entire project, including all units, inside areas, and outside areas. The purpose of a full inspection for a property with a score less than 60 is to identify additional health and safety defects that were not part of the REAC inspection sample survey (page 18). A copy of the survey results must be submitted to HUD.

*§*5.711(*c*) Technical Review of Inspection Results (page 178)

An owner or PHA can request a technical review of REAC inspection results. The request must be received by REAC no later than 45 calendar days following the day the inspection report is provided. This subsection has many technical details for owners and PHAs seeking a technical review.

§5.711(h) Responsibility to Notify Residents of Inspection; and Availability of Documents to Residents (page 182)

§5.711(h)(1) Notification to Residents

An owner or PHA must notify residents of any planned inspection of their units or their housing development generally.

§5.711(h)(2) Availability of Documents for Review

§5.711(h)(2)(i)

Once a final NSPIRE score is issued, an owner or PHA must make the physical inspection report and all related documents available to residents for review and copying during regular business hours – if a "reasonable" request is made. (NLIHC recommended that residents should not be charged for copying; HUD ignored NLIHC's request.)

"Related documents" include an owner's or PHA's survey plan, plan of correction, certification, and related correspondence. (NLIHC assumes "certification" means an owner/PHA certification that all Life-Threatening and Severe deficiencies have been corrected.)

§5.711(h)(2)(ii)

Once a final NSPIRE score is issued and published, an owner or PHA must make any additional information available to residents for review and copying during normal business hours – if a "reasonable" request is made. "Additional information" might include the results of any reinspection or owner/PHA technical appeal.

§5.711(h)(2)(iii)

An owner or PHA must maintain the documents related to a property's inspection for review by residents for 60 days from the date HUD provided the inspection score.

§5.711(h)(3) Posting on the Availability of Materials

An owner or PHA must post a notice to residents informing them that the materials described above are available. The notice must be posted in the owner's or PHA's management office and on any bulletin boards in all common areas on the date the owner or PHA receives the inspection score.

The notice must be translated into other languages if necessary to provide meaningful access for people with limited English proficiency (LEP).

The notice should include the name, address, and telephone number of the HUD field office contact.

§5.711(*h*)(4) {does not have a title}

Residents are encouraged to submit comments directly to their HUD Field Office regarding the information provided by an owner or PHA. Residents are encouraged to notify the HUD Field Office if they discover a false certification (that a Life-Threatening or Severe deficiency has not been corrected?).

§5.711(i) Administrative Review of Properties (page 183)

A property that receives two successive scores less than 60 "may" be referred to HUD's Departmental Enforcement Center (DEC) for evaluation.

Properties that receive a score of 30 points or less "shall" be automatically referred to the DEC for evaluation.

§5.711(i)(2), Evaluation of the Property

During the DEC's evaluation period, DEC will analyze a property, "which may include input from tenants, HUD officials, elected officials, maintenance staff, and others."

Summary of Small, Rural PHA NSPIRE Provisions

The "Economic Growth and Recovery, Regulatory Relief and Consumer Protection Act" ("Economic Growth Act") was signed into law on May 24, 2018. Section 209 made several amendments to the "Housing Act of 1937" pertaining to small, rural public housing agencies (PHAs). HUD published a notice in the *Federal Register* on February 27, 2020 explaining how HUD designates small, rural PHAs. The rule implements this definition of small, rural PHA as well as a new assessment system for their public housing and Housing Choice Voucher (HCV) programs. HUD states that the Economic Growth Act's focus on inspections, and the legislation's directive to follow the same standards for small, rural public housing as those for projects assisted under the Multifamily Section 8 Project-Based Rental Assistance program, kes the inclusion of the act's provisions in this rule a logical fit.

The final rule creates a new Subpart H under the current 24 CFR part 902 regulations for HUD's physical assessment of public housing, the Public Housing Assessment System (PHAS). Section 209(a)(2) of the Economic Growth Act defined "small public housing agency" and directed HUD to use the existing definition of "rural area" contained in the regulations governing the Consumer Financial Protection Bureau (CFPB). In the February 27, 2020 notice, HUD further refined this definition by defining PHAs that "predominantly operate in a rural area" and clarifying that these PHAs would be referred to as "small, rural PHAs" to avoid confusion with other small PHA designations used by HUD.

The May 11 *Federal Register* version of the final NSPIRE rule at: <u>https://bit.ly/3pvM9XM</u>

An easier-to-read preview version of the final NSPIRE rule is at: https://bit.ly/3pxumiX

The comparison of <u>NLIHC's recommendations</u> regarding the proposed rule and the final rule is at: <u>https://bit.ly/45153G6</u>

The NSPIRE webpage is at: <u>https://bit.ly/2MQ9Lmr</u>

The *Federal Register* version of the proposed rule is at: <u>https://bit.ly/3nI3dmJ</u>

An easier to read version of the proposed rule is at: <u>https://bit.ly/39pzYQw</u>

More information about all HUD programs subject to the new NSPIRE rule is available in NLIHC's 2023 Advocates' Guide.