



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING
REAL ESTATE ASSESSMENT CENTER

Ms. Rita Young
OMB Desk Office
Office of Management and Budget
New Executive Office Building
Washington, DC 20503

Dear Ms. Young:

The Department is seeking emergency review of the Paperwork Reduction Act (PRA) requirements regarding the National Standards for the Physical Inspection of Real Estate (NSPIRE) Demonstration. The Notice of Paperwork Submission (copy enclosed), proposed for immediate publication in the Federal Register for 14 days, explains the burden of the collection requirements and invites public comments. This is a new information collection.

In compliance with the requirements of 5 CFR § 1320.13, this letter requests emergency processing within 30 days from the date of publication. This request for emergency processing is essential to HUD's mission of ensuring safe, decent, and habitable housing for the nation's most at risk population. It also serves to expedite activities that support congressional and departmental efforts to protect residents living in HUD-assisted/insured housing from present and unnecessary harm through the identification and removal of health and safety hazards in their homes.

In 2017, as a result of the priority placed on resident health and safety by the Secretary, HUD initiated a wholesale reexamination of the department's Real Estate Assessment Center (REAC) physical inspection process as a means of bringing more HUD-assisted/insured housing into compliance with HUD's standards for acceptable housing. At the same time, the Government Accountability Office (GAO) conducted an audit that recommended changes to REAC inspections protocols, which would strengthen the department's ability to identify substandard housing. In response to the Secretary's concerns and GAO's recommendations, a departmental-level task force has initiated the NSPIRE Model – with the specific intent of expeditiously testing revisions to the inspection standards and protocol through a demonstration program to enable enhanced identification and resolution of health and safety deficiencies in HUD-assisted/insured housing. This PRA enables the collection of data needed to validate the NSPIRE Model, thereby allowing HUD to implement the changes necessary to protect resident health and safety.

To obtain input from interested agencies and members of the public regarding the burden associated with the collection, HUD has held a series of listening sessions through which many public housing agencies and property owners (collectively referred to as POAs) have received information, offered recommendations, and voiced their support for the NSPIRE Model. Also, HUD will solicit volunteer participants for the NSPIRE Demonstration through a separate

Federal Register notice, which will be subject to a public comment period. Through self-nomination, POAs will indicate they are aware of, and are willing to meet, the burden required by the self-inspections for the duration of the Demonstration. Further, HUD will also submit a PRA package to continue the collection beyond the 6-month emergency period. HUD believes these actions will offer adequate opportunities for comment on the collection and submission of POA self-inspection data.

In summary, the expedient transition to the NSPIRE Model is necessary for the Department to fulfill its responsibility of ensuring HUD assisted/insured housing is decent, safe, and habitable. A delay in the collection and evaluation of the information described in this PRA will result in a substantial, and possibly unrecoverable, postponement in the Demonstration and eventual implementation of the NSPIRE Model. Any such delay will ultimately place some residents living in HUD-assisted/insured housing at unnecessary risk.

Thank you for your consideration and assistance.

Sincerely,

Donald J. LaVoy
Deputy Assistant Secretary

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form HUD-713.1 (02/03)