

LAKELAND HOUSING AUTHORITY

NSPIRE INSPECTION POLICY AND IMPLEMENTATION PLAN

Agency	Housing Authority of the City of Lakeland, Florida
PHA Code	FL011
Agency Plan Year	Fiscal Year Beginning January 1, 2027
Board Resolution	Resolution No. 26-1575
Board Meeting / Adoption Date	September 21, 2026
Board Chair	David Samples
Executive Director / President & CEO	Benjamin Stevenson

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BOARD-READY STATUS This policy is formatted as a standalone attachment to the FY 2027 Annual Agency Plan. It should be executed with the Agency Plan package and maintained with the Administrative Plan inspection chapter.

Document Control and Approval

Control Item	Board-Ready Information
Policy owner	Executive Director / President & CEO or designee
Operational owners	Housing Choice Voucher, Property Management, Maintenance, Compliance, Procurement/IT, and Resident Services
Supersedes	Conflicting inspection language based solely on former HQS after the LHA NSPIRE implementation date
Review cycle	At least annually and whenever HUD revises applicable regulations, standards, notices, forms, or deadlines
Records copy	Executed resolution, approved policy, public-process record, HUD notification, training logs, tools, notices, inspection records, and enforcement records

Approval Statement

The Board of Commissioners adopts this Comprehensive NSPIRE Inspection Policy and Implementation Plan as an attachment to the Lakeland Housing Authority FY 2027 Annual Agency Plan, as controlling inspection policy language incorporated into the Public Housing ACOP and HCV Administrative Plan, and as the agency-wide physical-condition compliance framework for applicable RAD, mixed-finance, and Florida Housing/LIHTC communities, subject to each program's controlling authority and transition provisions.

Signature Page

Approval	Signature and Date
David Samples, Board Chair	Signature:  Date: 9/21/2026
Benjamin Stevenson, Executive Director / President & CEO	Signature:  Date: 9/21/2026

Resolution No. 26-1575: NSPIRE Adoption Addendum

A RESOLUTION OF THE BOARD OF COMMISSIONERS OF THE HOUSING AUTHORITY OF THE CITY OF LAKELAND APPROVING THE COMPREHENSIVE NSPIRE INSPECTION POLICY AND IMPLEMENTATION PLAN FOR PUBLIC HOUSING, VOUCHER PROGRAMS, AND FLORIDA HOUSING/LIHTC COMMUNITIES AS PART OF THE FY 2027 ANNUAL AGENCY PLAN, PUBLIC HOUSING ACOP, AND HCV ADMINISTRATIVE PLAN.

WHEREAS, the Housing Authority of the City of Lakeland administers HUD-assisted housing programs and is responsible for establishing and enforcing applicable physical-condition inspection standards;

WHEREAS, HUD established the National Standards for the Physical Inspection of Real Estate to prioritize resident health, safety, functionality, and habitability;

WHEREAS, HUD Notice PIH 2026-18 establishes February 1, 2027 as the latest voucher-program compliance date and requires PHAs to state inspection performance standards and procedures in the Administrative Plan;

WHEREAS, the Board previously approved Resolution No. 26-1575 for the FY 2027 Annual Agency Plan package, and this policy is intended to be included as an agency-plan and administrative-plan attachment under that resolution;

NOW, THEREFORE, BE IT RESOLVED that the Board adopts the attached Comprehensive NSPIRE Inspection Policy and Implementation Plan; incorporates the policy into the FY 2027 Annual Agency Plan, Public Housing ACOP, and HCV Administrative Plan; directs its coordinated use for applicable Florida Housing/LIHTC communities; authorizes the Executive Director / President & CEO to complete required notifications, certifications, procedures, training, procurement, forms, and non-substantive technical corrections; and requires further Board action when a revision constitutes a Significant Amendment or otherwise requires Board approval.

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1. Executive Policy Summary

KEY COMPLIANCE DATE LHA will be fully operational under NSPIRE for applicable HCV and PBV inspections no later than February 1, 2027. The Executive Director / President & CEO may authorize an earlier date after completion of the readiness certification in Appendix H.

Policy Element	LHA Standard
Inspection result	Pass/fail for voucher-program inspections; no numerical NSPIRE score
Inspectable scope	Assisted unit plus inside and outside areas that serve or are associated with the assisted unit
Life-threatening deficiency	Correct within 24 hours after owner notification
Severe or moderate deficiency	Correct within 30 calendar days after owner notification, unless an approved extension is documented
Low deficiency	Recorded for information and does not cause failure unless HUD's current standard provides otherwise
Transition cases	The standard in effect on the original inspection date follows the case through final resolution
Enforcement	Initiate applicable HAP withholding, abatement, contract action, relocation, or family action when required

2. Authority, Purpose, Scope, and Definitions

2.1 Authority

This policy is based on applicable provisions of 24 CFR parts 5, 35, 882, 982, and 983; the NSPIRE final rule; HUD's current NSPIRE standards; Notice PIH 2026-18 and successor guidance; and applicable MTW authority. If a cited authority is amended, LHA will administer the controlling current requirement and process any required plan amendment.

2.2 Purpose

- Protect residents from health and safety hazards.
- Define objective inspection and documentation practices.
- Establish correction, verification, enforcement, and quality-control requirements.
- Coordinate policy, people, processes, and tools before implementation.
- Integrate NSPIRE into the FY 2027 Agency Plan and HCV Administrative Plan.

2.3 Scope

This policy applies to the Lakeland Housing Authority's Public Housing program; Housing Choice Voucher, Project-Based Voucher, and Moderate Rehabilitation programs; PHA-owned voucher units; RAD Project-Based Voucher and RAD Project-Based Rental Assistance communities; RAD/Section 18 blended and other mixed-finance properties; and LHA-owned, controlled, affiliated, or managed Low-Income Housing Tax Credit and Florida Housing Finance Corporation-funded communities. Each property and program shall follow its controlling statute, regulation, HUD

notice, HAP contract, Annual Contributions Contract, RAD use agreement, regulatory agreement, extended-use or land-use restriction agreement, financing documents, approved MTW authority, ACOP, Administrative Plan, and other applicable governing requirements.

Program-specific inspection scope, sampling, frequency, scoring or pass/fail methodology, correction periods, certification, technical or administrative review, enforcement, accessibility, resident protections, and record-retention requirements remain controlling. Voucher-program procedures shall not be applied to Public Housing, HUD Multifamily, RAD PBRA, or Florida Housing/LIHTC monitoring unless the applicable authority expressly permits that use. When multiple programs apply to the same property, LHA shall use the property-specific crosswalk in Appendix L and comply with each applicable requirement without treating one inspection as a substitute for another unless specifically authorized.

2.4 Core Definitions

Term	Definition
Affirmative habitability requirement	A minimum condition required for an inspectable area under 24 CFR 5.703 and the applicable NSPIRE standard.
Deficiency	An observed condition that does not meet an applicable NSPIRE standard.
Inside	Common areas and building systems inside the building and outside an assisted unit.
Life-Threatening (LT)	A deficiency designated by HUD as presenting a high risk of death to a resident.
Moderate / Severe	Failing non-life-threatening deficiency levels subject to the applicable correction period.
Outside	Site, exterior components, and building systems located outside the building or unit.
Unit	Interior components of the assisted or proposed assisted dwelling unit.
Verification	Acceptable evidence that a cited deficiency was corrected, including reinspection or another method authorized by HUD and LHA policy.

3. Governance and Responsibilities

Role	Required Responsibilities
Board of Commissioners	Adopt policy; approve significant amendments; receive implementation and compliance reporting.
Executive Director / President & CEO	Set implementation date; ensure funding and cross-department readiness; authorize procedures and technical updates.
Senior Vice President / Compliance Lead	Coordinate implementation; maintain policy crosswalk; monitor corrective actions and quality assurance.
HCV Director	Own voucher inspection workflow, notices, HAP enforcement, owner/family communication, and case-file completeness.

Role	Required Responsibilities
Inspectors	Apply current standards consistently; document observable evidence; issue accurate classifications; maintain impartiality.
Quality Control Reviewer	Perform supervisory QC inspections and file reviews; identify trends; require corrective training.
Property Management / Maintenance	Maintain agency-controlled properties; coordinate work orders; document correction; support resident communication.
IT / Procurement	Maintain compliant inspection tool, data access, retention, vendor controls, and continuity procedures.
Owners	Provide access; maintain standards; correct deficiencies; submit reliable correction evidence.
Families	Provide access; report hazards; avoid tenant-caused damage; comply with family obligations.
Management	Maintain Public Housing NSPIRE readiness, ACOP consistency, work-order controls, correction certification, REAC response, and capital escalation.
LIHTC / Florida Housing Compliance Lead	Maintain property compliance profiles; coordinate Florida Housing monitoring, corrective responses, owner certifications, investor notices, reserve requests, and Form 8823 risk response.
Section 504 / Accessibility Coordinator	Maintain accessible-unit inventory, route accommodation and modification requests, verify accessibility corrections, and coordinate transition-plan actions.
RAD Asset Manager / Owner Representative	Maintain post-conversion inspection responsibility matrix, HAP and ownership compliance, lender/investor coordination, and capital-needs follow-up.

4. Transition from Previous HQS to NSPIRE

4.1 Implementation Date and HUD Notification

LHA shall notify HUD of the actual or planned implementation date in the manner stated in Notice PIH 2026-18 and shall copy the applicable HUD Field Office representative. The implementation date may not be later than February 1, 2027. The notification record and HUD confirmation shall be retained in the policy file.

4.2 Open Inspection Cases

The inspection standard in effect on the date of the original inspection shall remain controlling through correction verification, reinspection, enforcement, and final closure. Staff shall label each open case “Legacy HQS” or “NSPIRE” in the inspection and HCV systems to prevent mixed standards.

4.3 Forms and Tools

After LHA implements NSPIRE, staff shall discontinue HUD-52580, HUD-52580-A, and local variations of those forms for new applicable inspections. LHA may use HUD's optional HCV/PBV checklist or a third-party tool only after verifying that the selected tool reflects the current NSPIRE standards and LHA procedures.

4.4 Transition Controls

- Freeze and archive legacy form templates on the implementation date.
- Maintain separate correction queues for legacy HQS and NSPIRE cases.
- Issue owner and family notices before the first NSPIRE inspection.
- Complete inspector competency checks before independent NSPIRE assignments.
- Test notices, deadlines, inspection results, work queues, and HAP enforcement end to end.

5. Inspection Standards and Inspectable Areas

5.1 Adopted Standards

LHA adopts the current HUD NSPIRE standards applicable on the inspection date, including HUD's Life-Threatening list and affirmative habitability requirements. LHA will not add an LT condition or increase a HUD severity classification without HUD approval when required.

Area	Voucher Inspection Scope	Examples
Unit	The interior of the assisted or proposed assisted unit.	Bathroom, kitchen, ceilings, doors, electrical components, floors, HVAC, lighting, smoke/CO alarms, walls, water heater, windows.
Inside	Common areas and interior building systems that serve or are associated with the assisted unit.	Corridors, stairs, laundry, mechanical rooms, community areas, fire protection, elevators, shared systems.
Outside	Exterior and site areas that serve or are associated with the assisted unit.	Walkways, parking, refuse, drainage, play areas, foundations, roofs, exterior walls, exterior lighting.

5.2 Inspection Principles

- Inspect observable conditions against the applicable objective standard.
- Prioritize health, safety, functionality, and habitability.
- Do not fail a unit solely for cosmetic or aesthetic conditions unless the condition meets a defined deficiency.
- Do not expand an individual voucher inspection into a full-property inspection beyond the applicable associated areas.
- Document location, condition, severity, responsible party when determinable, and required deadline.

6. Inspection Types, Frequency, and Scheduling

Inspection Type	LHA Procedure
Initial / pre-contract	Inspect prior to approval and HAP contract execution as required. Assistance will not begin until applicable inspection and program requirements are met.
HCV periodic	Conduct at least biennially unless a different frequency is authorized and adopted by LHA.

Inspection Type	LHA Procedure
PBV turnover	Inspect before occupancy by a new assisted family as required.
PBV periodic sample	Inspect the required random sample of contract units in each building at least biennially unless another authorized frequency applies.
Moderate Rehabilitation	Conduct at least annually.
Interim / complaint	Inspect when a reported condition may violate standards or when required by program rules.
Supervisory quality control	Reinspect a representative selection to evaluate inspector accuracy, consistency, and completeness.
Follow-up / verification	Confirm correction of failed deficiencies using an authorized method.

6.1 Access and Notice

LHA will provide inspection notice consistent with the Administrative Plan, lease, HAP contract, due-process requirements, and reasonable-accommodation obligations. Repeated failure to provide access will be addressed under applicable owner or family obligations after adequate notice and documentation.

7. Deficiency Classification and Correction Timelines

Classification	Inspection Result	Correction Deadline	Minimum Response
Life-Threatening	Fail	Within 24 hours after owner notification	Immediate notice; identify protective action; verify correction; enforce if missed.
Severe	Fail	Within 30 calendar days after owner notification unless approved extension applies	Written result; owner repair; verification; enforcement if missed.
Moderate	Fail	Within 30 calendar days after owner notification unless approved extension applies	Written result; owner repair; verification; enforcement if missed.
Low	Pass	No failure deadline unless HUD or another law requires action	Record and communicate for information and preventive maintenance.

7.1 Extensions

LHA will not extend an LT deadline. For a severe or moderate deficiency, an extension may be approved only when allowed by HUD requirements and LHA policy, the delay is outside the owner's reasonable control, interim protections are adequate, and the approval is documented with a revised date. An extension does not waive enforcement if conditions become unsafe.

7.2 Responsible Party

LHA will determine whether a deficiency is owner-caused, family-caused, or otherwise attributable based on observable facts and applicable program requirements. The inspection result shall not be delayed while responsibility is disputed when immediate safety action is required.

8. Inspection Results, Verification, and Reinspection

8.1 Results Notice

- Unit and inspection identifiers; date and type of inspection.
- Pass/fail outcome and each deficiency, location, classification, and correction deadline.
- Owner and family responsibilities and acceptable verification method.
- Potential HAP contract or family consequences.
- Reasonable accommodation and language-assistance contact information.

8.2 Verification Methods

Method	Use Standard
On-site reinspection	Default when physical observation is necessary, evidence is inconclusive, multiple conditions exist, or risk warrants.
Photographic verification	May be accepted when authorized by HUD and LHA and the image clearly identifies the location, corrected condition, and date/context.
Remote video inspection	May be used when permitted by HUD and LHA procedures and when the method permits reliable observation and documentation.
Qualified third-party documentation	May be accepted for conditions requiring licensed or specialized work when credibility and completion are adequately established.

8.3 Closure

A failed inspection shall remain open until all failing deficiencies are verified as corrected or the case is resolved through an authorized enforcement, relocation, termination, or contract action. Staff shall document the closure basis and date.

9. Enforcement and HAP Contract Remedies

When an owner fails to correct a cited LT, severe, or moderate deficiency by the applicable deadline, LHA shall initiate the enforcement action required by the HAP contract, regulations, HOTMA provisions, and Administrative Plan. Available actions may include withholding, abatement, HAP contract termination, transfer or relocation assistance, and other remedies. Family-caused deficiencies shall be addressed under family-obligation and due-process requirements.

Trigger	Required Case Action
LT deadline missed	Confirm status immediately; implement applicable HAP and safety action; document resident protection and escalation.
Severe/moderate deadline missed	Initiate required HAP enforcement; issue notices; establish next review or relocation step.

Trigger	Required Case Action
Owner refuses access or correction	Document refusal; apply contract remedies; evaluate participant protection and housing options.
Family-caused damage	Notify family; provide applicable opportunity to cure and informal process; proceed under family obligations if unresolved.
Recurring owner noncompliance	Escalate for owner oversight, participation restrictions where authorized, legal review, and portfolio risk monitoring.

NO AUTOMATIC PAYMENT RELEASE Any withheld or abated payment action shall be handled according to the applicable HAP contract, regulation, and Administrative Plan. Staff shall not release payments without documented compliance and required approvals.

10. Owner and Family Responsibilities

Party	Responsibilities
Owner	Maintain the unit and associated areas; provide access; correct owner-caused deficiencies; protect residents; maintain smoke and CO alarms; comply with lead, mold/moisture, pest, and other applicable laws; submit truthful evidence.
Family	Permit inspections; promptly report hazards; avoid damaging the unit; correct family-caused deficiencies when required; maintain utilities and appliances assigned under the lease; follow emergency instructions.
LHA	Provide clear standards and notices; conduct consistent inspections; protect due process; verify correction; enforce timely; provide reasonable accommodation and language access.

11. Special Compliance Requirements

11.1 Smoke Alarms

LHA will inspect for current federal smoke-alarm requirements regardless of whether an inspection is conducted under legacy HQS during transition or NSPIRE. Required devices must comply with applicable federal fire-safety requirements, including hardwired or sealed 10-year battery requirements where applicable.

11.2 Carbon Monoxide Alarms

LHA will enforce applicable carbon-monoxide alarm requirements in every inspection standard used during transition. Staff will not rely on a legacy form that omits current CO requirements.

11.3 Unvented Fuel-Burning Space Heaters

The presence of an unvented fuel-burning space heater is treated as an LT failed item requiring correction within 24 hours, consistent with Notice PIH 2026-18.

11.4 Lead-Based Paint

NSPIRE does not replace LHA, owner, or contractor obligations under 24 CFR part 35. Applicable pre-1978 units, common areas, and exterior painted surfaces shall receive required visual assessment and follow-up. Corrections and occupant protection shall comply with the Lead Safe Housing Rule.

11.5 Mold, Moisture, and Pest Conditions

LHA will classify and address mold-like substance, leaks, moisture sources, and infestation under current NSPIRE standards and other applicable law. Temporary controls do not replace permanent correction when permanent correction is required.

11.6 PHA-Owned Units

Inspection of PHA-owned housing under the voucher program shall be performed by an independent entity when required. The independent entity shall communicate results to the family and LHA as required.

11.7 Special Housing Types

NSPIRE standards apply to special housing types except where modified by the specific requirements of 24 CFR part 982, subpart M, or other controlling program rules.

12. Variations and Alternative Inspection Methods

12.1 Variations

LHA shall not implement a variation from an NSPIRE standard unless HUD approval is required and has been received. A request shall identify the PHA and code, requested standard modification, qualifying local code or unique climatic/geographic basis, and justification that the proposal meets or exceeds NSPIRE protection or significantly expands housing opportunity. Approved variations shall be incorporated into the Administrative Plan.

12.2 Alternative Inspection Methods

LHA may rely on qualifying HOME, LIHTC, HUD, or HUD-approved methods consistent with 24 CFR 982.406 and HUD guidance. After NSPIRE implementation, any previously approved method requiring renewed review shall be analyzed against current NSPIRE and resubmitted when required. The Administrative Plan shall identify approved methods.

13. Quality Control and Performance Management

13.1 Quality Control Program

- Use risk-based and representative QC sampling across inspectors, inspection types, owners, neighborhoods, and outcomes.
- Review classification accuracy, photographs/notes, deadlines, notices, verification, and enforcement.
- Document findings, corrective coaching, retraining, and repeat review.
- Escalate patterns that indicate tool, training, vendor, or policy failure.

13.2 Management Dashboard

Measure	Management Use
Inspections due/completed	Monitor timeliness and workload.
Pass/fail by inspection type	Identify process and property trends without evaluating individual employees.

Measure	Management Use
LT corrections verified within deadline	Monitor resident-safety response.
Open severe/moderate deficiencies by age	Prevent overdue cases.
HAP enforcement initiated timely	Confirm contract compliance.
QC disagreement rate	Target calibration and procedural improvement.
Owner repeat-failure pattern	Support owner outreach and risk controls.
Reasonable accommodation / LEP delivery	Confirm equitable access and communication.

13.3 Corrective Action

Material quality-control findings will produce a written corrective action identifying the issue, responsible process owner, corrective step, due date, validation method, and closure approval. Systemic findings shall be reported to executive management and the Board as appropriate.

14. Technology, Forms, Records, and Privacy

14.1 Technology Controls

- Maintain the current NSPIRE standard library and effective date.
- Preserve an auditable record of changes to findings and deadlines.
- Apply role-based access, authentication, backup, and recovery controls.
- Support offline or continuity procedures when connectivity is unavailable.
- Validate vendor tools independently; vendor representation does not transfer LHA compliance responsibility.

14.2 Required Record

- Notice and scheduling history.
- Completed inspection record, findings, photos/notes, and classification.
- Owner/family results notices and proof of delivery.
- Correction evidence, reinspection, and closure record.
- Extension approval and interim protection, if any.
- HAP or family enforcement notices and actions.
- Reasonable accommodation, interpreter, and language-access actions where applicable.
- QC review and corrective action.

14.3 Retention and Privacy

Records shall be retained under HUD, federal grant, litigation-hold, privacy, and LHA records schedules. Staff shall collect and disclose only information necessary for inspection administration, protect resident information, and avoid including unnecessary personal information in photographs or reports.

15. Training and Communication Plan

Audience	Minimum Content	Evidence
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Audience	Minimum Content	Evidence
Inspectors	Standards, severity, associated areas, documentation, tools, lead/CO/smoke, verification, ethics, accessibility.	Completion record, knowledge check, observed competency.
HCV and compliance staff	Scheduling, notices, deadlines, extensions, enforcement, records, transition queues.	Training roster and workflow exercise.
Maintenance/property staff	Deficiency response, work-order evidence, resident protection, agency-owned units.	Training roster and drill.
Owners	What changes, effective date, major safety requirements, deadlines, evidence, enforcement.	Notice, briefing materials, attendance/outreach log.
Families	Purpose, access, reporting hazards, notices, family responsibilities, accommodation and language help.	Notice, briefing insert, website/office posting.

15.1 Communication Standard

LHA shall notify participating owners and families of NSPIRE, the applicable standards, and the implementation date before inspections transition. Communications will be written in plain language and provided in accessible formats and translated or interpreted consistent with LHA's Language Access Plan.

16. Reasonable Accommodation, LEP, and Fair Housing

LHA will administer inspections consistently with Section 504, the ADA, the Fair Housing Act, Title VI, applicable LEP requirements, and LHA policies. A reasonable-accommodation request is an individualized determination and is not an NSPIRE standards variation requiring HUD approval. Accommodations may address scheduling, communication, access, presence of a support person, remote methods when permitted, or other effective adjustments that do not waive health and safety standards.

EQUAL ACCESS No person will be denied meaningful access to the inspection process because of disability or limited English proficiency. Staff must document the assistance provided without including unnecessary medical or personal details.

17. Complaints, Appeals, and Informal Processes

Owners and families may report concerns about an inspection record, correction decision, access issue, or enforcement action. LHA will provide the review, informal hearing, or informal review required by the applicable regulation and Administrative Plan. A dispute does not suspend an immediate safety action or an LT correction requirement unless HUD authority expressly provides otherwise.

Issue	Routing
Factual error in inspection record	Supervisor review and documented correction if warranted.
Disagreement with owner/family responsibility	Program review using inspection evidence, lease/HAP obligations, and due process.
Reasonable accommodation	Route promptly to the Section 504/Reasonable Accommodation process.

Issue	Routing
Language access	Provide interpreter/translation support and reissue essential notice when needed.
Staff/vendor conduct complaint	Route to management under complaint and contract-oversight procedures.
Potential retaliation or fair housing concern	Escalate to fair housing/compliance leadership immediately.

18. Implementation Work Plan and Readiness Gate

Phase	Required Deliverables	Accountable Lead
1. Governance	Board adoption; policy crosswalk; implementation team; decision log.	Executive Director / President & CEO
2. Policy and process	Administrative Plan language; SOPs; forms; deadline and enforcement matrix.	HCV Director / Compliance
3. People	Inspector, HCV, maintenance, owner, and family training.	Department leads
4. Tools	Checklist/software configuration; user acceptance test; records and privacy controls.	IT / Procurement / HCV
5. Transition	HUD notification; owner/family notices; legacy-case labeling; form cutover.	HCV Director
6. Readiness validation	Mock inspections; case simulation; QC review; executive certification.	Compliance / QC
7. Go-live and stabilization	Daily issue review initially; overdue-case monitoring; first management report.	Implementation team

18.1 Go-Live Readiness Gate

- Approved policy and Administrative Plan language are accessible to staff.
- HUD implementation notification is sent and confirmation retained.
- All assigned inspectors have demonstrated competency.
- Inspection tool contains current standards and correct deadlines.
- Owner and family notices have been issued.
- Legacy HQS cases are separately identified.
- Results, correction, verification, extension, and enforcement workflows pass testing.
- Backup and continuity procedures are operational.
- Executive readiness certification in Appendix H is signed.

19. Agency Plan and Administrative Plan Integration

19.1 Controlling Language

Beginning on LHA's documented NSPIRE implementation date, references to former HQS in local policies, forms, notices, or procedures shall be read as legacy references only for inspections initiated before that date or where HUD expressly retains the term. Staff shall use the current NSPIRE standard for new applicable inspections.

19.2 Annual Review

Compliance staff shall complete an annual legal and operational review of regulations, HUD notices, standards, forms, training, technology, inspection results, QC findings, and owner/family feedback. Technical updates may be made under the authority granted by the Board; substantive changes shall be returned for approval when required.

20. Public Housing ACOP and REAC/NSPIRE Requirements

20.1 ACOP Incorporation and Controlling Authority

The Public Housing provisions of this policy are incorporated by reference into the LHA Admissions and Continued Occupancy Policy. Public Housing inspections shall follow the NSPIRE final rule, applicable REAC administrative procedures, scoring notices, inspection protocol, the Annual Contributions Contract, the dwelling lease, the ACOP, and current HUD guidance. Where this policy uses voucher-program terminology or pass/fail treatment, the Public Housing-specific scoring, sampling, correction, certification, technical review, and administrative review requirements control.

20.2 Public Housing Inspection and Maintenance System

- LHA shall maintain a year-round inspection and preventive-maintenance system rather than preparing only for a scheduled REAC inspection.
- Property staff shall conduct move-in, move-out, annual or routine, emergency, complaint, preventive-maintenance, housekeeping when authorized, and quality-control inspections under the ACOP, lease, and operating procedures.
- Unit, Inside, and Outside areas shall be reviewed for functional adequacy, operability, affirmative habitability requirements, and health and safety hazards.
- Work orders shall identify the observed condition, location, NSPIRE classification when applicable, interim protection, assigned responsibility, due date, completion evidence, and supervisory closure.
- Resident notices, entry, emergency access, lease enforcement, grievances, reasonable accommodation, and language access shall follow the ACOP and applicable civil-rights requirements.

20.3 Public Housing Deficiency Response

Public Housing Control	LHA Requirement
Life-threatening deficiencies	Initiate immediate protective action and correct within the applicable HUD timeframe; document notification, work performed, and verified closure.
Severe and moderate deficiencies	Correct within the applicable HUD/REAC timeframe and maintain evidence sufficient for required certification or verification.
Low deficiencies and preventive items	Record and route for preventive maintenance or capital planning when correction is not otherwise immediately required.

Public Housing Control	LHA Requirement
REAC inspection response	Review the inspection report, reconcile deficiencies to work orders, complete required correction certification, and evaluate technical or administrative review rights within applicable deadlines.
Capital needs	Escalate systemic or capital deficiencies to the physical needs assessment, Capital Fund planning, operating budget, procurement plan, and Board reporting as appropriate.
Resident-caused conditions	Address through documented maintenance, lease, grievance, and due-process procedures without delaying required health and safety protection.

20.4 ACOP Cross-Reference Standard

The ACOP shall identify this policy as the controlling physical-condition and NSPIRE implementation attachment. LHA will maintain consistent provisions concerning inspection access, resident responsibilities, maintenance charges, grievance rights, emergency entry, transfers, reasonable accommodation, housekeeping standards, and lease enforcement. If the ACOP and this policy conflict, controlling federal authority applies and LHA shall process a conforming technical or substantive amendment, as required.

21. Florida Housing and LIHTC Community Requirements

21.1 Applicability and Rule Hierarchy

This section applies to LHA-owned, controlled, affiliated, or managed communities receiving Low-Income Housing Tax Credits or other Florida Housing Finance Corporation funding. Physical-condition compliance shall be administered under Internal Revenue Code Section 42, Treasury Regulation §1.42-5, applicable Florida Housing rules and compliance guidance, the property's regulatory agreement, extended use agreement or land use restriction agreement, funding documents, and any additional HUD program requirements. The most protective applicable requirement shall be followed when requirements overlap, unless a controlling authority directs otherwise.

21.2 Florida Housing Monitoring Readiness

- Maintain a property-specific compliance profile listing every funding source, monitoring agency, regulatory period, required inspection protocol, correction period, reporting portal or method, and responsible entity.
- Perform routine unit, building, common-area, exterior, grounds, accessibility, life-safety, and building-system inspections using the physical-condition standard required by Florida Housing and the applicable funding documents.
- Maintain current rent and income compliance records separately from physical-condition records while cross-linking affected units and households when a finding implicates both areas.
- Provide required owner, agent, investor, syndicator, lender, and agency notices and certifications through authorized representatives.
- Do not represent an internal inspection as an official Florida Housing monitoring inspection or as a substitute for any agency inspection unless expressly authorized.

21.3 LIHTC Physical-Condition Corrective Action

Control Point	Required Documentation
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Control Point	Required Documentation
Pre-inspection readiness	Property walk, open-work-order aging, vacant-unit status, life-safety check, accessibility review, vendor scheduling, and document index.
Finding intake	Agency report date, finding text, building/unit/location, cited authority, severity or category, response deadline, and assigned owner.
Correction	Work order, invoice, photograph, certification, permit or licensed-contractor evidence, resident communication, and completion date, as applicable.
Quality review	Independent supervisory verification that the cited condition and any related systemic condition were corrected.
Agency response	Complete response package submitted by the required deadline with proof of delivery and retained confirmation.
Recurring or systemic issue	Root-cause analysis, expanded sampling, preventive-maintenance change, capital plan or reserve request, training, and management follow-up.
Unresolved noncompliance	Escalation to executive leadership, owner entity, legal counsel, investor/syndicator, and other parties required by governing documents.

21.4 No Improper Program Substitution

Voucher pass/fail rules, Public Housing REAC scoring, and Florida Housing/LIHTC monitoring are distinct compliance frameworks. Staff shall not substitute one program's sample, score, correction certification, appeal process, or enforcement mechanism for another. When a community has multiple funding sources, the compliance profile and inspection report shall separately identify each controlling requirement and the evidence used to satisfy it.

21.5 Records and Retention

Each LIHTC community shall retain inspection notices, inspection reports, sampling information made available to the owner, deficiency logs, work orders, photographs, invoices, permits, certifications, correspondence, proof of submission, agency determinations, and closeout evidence for the period required by Section 42, Florida Housing, funding documents, litigation holds, and LHA policy. Records shall be protected against unauthorized disclosure and maintained in an auditable property file.

22. Mixed-Finance and Multiple-Program Rule Coordination

For Public Housing, RAD, PBV, LIHTC, HOME, SAIL, bond-financed, or other layered communities, LHA shall prepare and maintain a property-specific inspection crosswalk. The crosswalk shall identify the applicable physical standard, inspecting or monitoring entity, inspection frequency, sample method, scoring or pass/fail method, deficiency correction period, certification method, owner/agent response obligation, appeal or review process, and record-retention rule. The crosswalk is an administrative control and does not modify any program requirement.

Program/Layer	Policy Integration	Key Separation Control
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Program/Layer	Policy Integration	Key Separation Control
Public Housing	ACOP, lease, maintenance plan, REAC/NSPIRE procedures, Capital Fund plan	Use Public Housing sampling, scoring, certification, and review requirements.
HCV/PBV/Mod Rehab	HCV Administrative Plan, HAP contract, voucher NSPIRE procedures	Use voucher pass/fail, correction, verification, and HAP enforcement rules.
LIHTC / Florida Housing	Regulatory agreement, extended use/LURA, Florida Housing compliance requirements, Section 42 monitoring	Use Florida Housing monitoring, response, and owner certification requirements.
HOME/SAIF/Other funding	Funding agreement and applicable federal/state property standards	Track separate inspection and correction obligations by funding source.
Mixed-finance/RAD	All applicable governing documents and post-conversion requirements	Maintain a written rule hierarchy and do not merge incompatible appeal or enforcement processes.

20.5 REAC Technical Review and Inspection Appeal Controls

LHA shall evaluate every Public Housing or HUD Multifamily inspection report promptly for potential factual, building-data, unit-count, ownership-boundary, code-conflict, modernization, adverse-condition, or inspector-error issues. A request for technical review shall be submitted only when supported by verifiable evidence and when authorized under current HUD requirements. Submission of a review request does not suspend hazard mitigation, correction, certification, resident protection, or other required action.

Control	Required LHA Action
Initial review	Public Housing/Asset Management and Compliance review the report, score, photographs, property profile, and cited standards immediately upon receipt.
Decision authority	Executive Director / President & CEO or written designee approves submission; counsel reviews material legal, code, ownership, or due-process issues.
Evidence file	Retain inspection report, photographs, work orders, permits, third-party opinions, ownership records, system data, local-code authority, and chronology.
Submission	Use the HUD-designated electronic system and meet the deadline in the current rule, notice, or HUD guidance.
Parallel correction	Continue all mitigation, correction, certification, and resident-protection duties while review is pending.
Decision closeout	Record HUD's decision, score effect, remaining corrective obligations, system updates, and management follow-up.

20.6 Public Housing Housekeeping and Lease-Enforcement Boundary

NSPIRE findings shall be based on objective deficiencies and shall not be used to impose subjective cosmetic or housekeeping preferences. Clutter, sanitation, storage, animal, pest-contributing, or housekeeping conditions may be addressed under the dwelling lease and ACOP only when supported by documented lease standards, due process, and observable facts. If a condition also meets an NSPIRE deficiency, staff shall separately document the inspection finding and the lease-enforcement basis. Immediate health and safety protection shall not be delayed by a responsibility dispute.

20.7 Public Housing Capital Planning Escalation

Condition or Pattern	Minimum Escalation
Roof, envelope, drainage, or structural system	Engineering or qualified assessment; work-order stabilization; Capital Fund or other financing evaluation.
Repeated HVAC, plumbing, electrical, elevator, or fire-system failures	Systemic review; procurement strategy; lifecycle replacement analysis; operating/capital budget action.
Accessibility barrier or recurring accommodation-related modification	Section 504 review; transition-plan or property action plan; funding and schedule assignment.
Site infrastructure, lighting, walkway, parking, or security-related physical condition	Property risk review; capital scope; procurement and funding decision.
Repeated deficiency across buildings or properties	Expanded sampling; root-cause analysis; physical-needs assessment update; Board reporting when material.

23. Accessibility, Section 504, ADA, Fair Housing, and Accessible Units

23.1 Controlling Standards and Property Profile

For each property, LHA shall identify the accessibility standards and obligations that apply based on program, funding source, construction or alteration history, regulatory agreement, approved design documents, and reasonable-accommodation requirements. The property profile shall identify accessible and adaptable units, mobility and sensory features, accessible routes, common-use areas, communication features, known approved modifications, and the responsible compliance official. This policy does not declare any property or unit compliant solely because an NSPIRE inspection was passed.

23.2 Inspection and Work-Order Controls

- Do not remove, obstruct, disable, or alter an accessible feature without documented compliance review.
- Record the exact accessible feature, location, observed condition, applicable source document, interim protection, and correction evidence.
- Route resident requests for physical changes or process adjustments through the Reasonable Accommodation/Section 504 procedure without requiring a particular form.
- Protect confidential disability-related information and place only operationally necessary information in the inspection or work-order record.
- Verify corrections affecting ramps, routes, doors, hardware, kitchens, bathrooms, alarms, communication devices, parking, lifts, elevators, and designated accessible units through qualified review when needed.

23.3 Accessibility Compliance Matrix

Area	Required Control
Accessible unit inventory	Reconcile property records and unit designations; document mobility, hearing/vision, adaptable, and modified features.
Accessible route	Inspect route continuity from site arrival points to units and common areas; route barriers for immediate or scheduled correction based on risk.
Common areas and programs	Confirm physical access and effective access to offices, community rooms, laundry, mail, refuse, parking, and resident programs as applicable.
Resident-specific modification	Preserve approved features; coordinate repair and temporary accommodation; document resident communication.
Alteration or capital project	Complete pre-design accessibility review, construction inspection, and closeout verification under the applicable standard.
Monitoring and complaints	Track unresolved barriers, accommodation requests, corrective actions, responsible official, funding source, and closure evidence.

24. Affirmative Habitability and Environmental Health Controls

24.1 Affirmative Habitability Control Matrix

The current HUD NSPIRE standards and effective notices control. The matrix below is an operational cross-check and shall not replace the current standard library or program-specific scoring and correction requirements.

Control Area	Operational Cross-Check
Water and sanitation	Functional potable water, hot and cold water where required, sanitary facilities, drainage, and absence of uncontrolled sewage conditions.
Thermal environment	Permanent and functional heating or cooling components where required; safe equipment and resident protection during outages.
Electrical and lighting	Safe electrical service, required lighting, protected conductors, functional components, and no water contact with energized equipment.
Fire and gas safety	Required smoke and carbon-monoxide alarms, safe egress, fire protection components, and response to gas or combustion hazards.
Structure and weather protection	Sound floors, walls, ceilings, roofs, doors, windows, guardrails, stairs, and protection from water intrusion.

Control Area	Operational Cross-Check
Food preparation and refuse	Required food-preparation components, safe appliances when provided, and sanitary refuse storage/removal.
Access and security	Functional entry, egress, locks, routes, and common-area access consistent with applicable standards.
Environmental conditions	Lead-based paint, mold/moisture, infestation, asbestos, radon, indoor-air, and other hazards addressed under the controlling law, standard, or site-specific plan.

24.2 Environmental Health Hazard Protocol

NSPIRE does not replace separate environmental, occupational, building-code, public-health, or funding-source requirements. When asbestos-containing material, radon risk, significant moisture, mold-like substance, pest infestation, sewage, combustion products, indoor-air concerns, or another environmental hazard is observed or reported, staff shall secure immediate safety needs, avoid disturbing suspect material, notify the appropriate program and compliance officials, obtain qualified assessment when required, and document interim and permanent correction. No employee shall characterize a substance or exposure beyond the employee's training and authorization.

25. RAD and Mixed-Finance Physical-Condition Compliance

25.1 Property-Specific RAD Responsibility Matrix

Each RAD or RAD/Section 18 blended property shall maintain a written matrix identifying whether assistance is RAD PBV or RAD PBRA; the owner, management agent, contract administrator, inspecting entity, lender, investor, syndicator, and accessibility contact; the applicable HAP contract and RAD use agreement; inspection standard and frequency; correction and certification method; capital-needs obligations; and notice, appeal, and record-retention responsibilities.

RAD Structure	Inspection and Oversight Control
RAD PBV	Apply the RAD Notice and applicable PBV requirements, HAP contract, Administrative Plan, and approved alternative requirements. Use an independent entity for inspections or determinations when required because of PHA ownership interest.
RAD PBRA	Apply the RAD Notice, Multifamily HAP contract and HUD Multifamily/NSPIRE requirements, including the HUD-designated inspection and response process.
RAD with LIHTC or Florida Housing funding	Maintain separate HUD, tax-credit, lender, investor, and Florida Housing obligations and a combined corrective-action tracker without substituting one program's inspection for another unless authorized.
RAD/Section 18 blend or other repositioning structure	Maintain the approved transaction documents, unit status, assistance type, ownership responsibilities, and post-closing inspection requirements for each unit or building.

RAD Structure	Inspection and Oversight Control
Construction or rehabilitation period	Coordinate construction quality control, relocation protections, accessibility, environmental requirements, completion certifications, warranties, and transition to routine operations.

25.2 Post-Conversion and Asset-Management Controls

- Reconcile inspection findings to the capital-needs assessment, replacement-reserve schedule, operating budget, warranties, and property management plan.
- Track completion of RAD transaction repairs and continuing physical-condition obligations separately from routine maintenance.
- Notify lenders, investors, syndicators, contract administrators, and owner entities when required by governing documents.
- Preserve resident rights, accommodation obligations, grievance or hearing rights, and relocation protections applicable to the converted assistance.
- Report material unresolved physical-condition, funding, inspection, or ownership-control risks to executive leadership and the Board.

26. Florida Housing Noncompliance, Form 8823 Risk, and Reserve Controls

26.1 Monitoring Finding and Corrective-Action Procedure

Upon receipt of a Florida Housing monitoring report, notice of noncompliance, or other formal finding, the LIHTC/Florida Housing Compliance Lead shall establish a controlled response file, preserve the exact finding language, identify the responsible owner and management entities, calculate the response deadline from the agency notice, and coordinate correction, certification, and proof of delivery. LHA shall not state that a finding has been accepted or closed until written agency confirmation or another controlling closeout basis is retained.

26.2 Form 8823 Risk Response

The state housing credit agency, not LHA as property owner or manager, determines whether and how to report LIHTC noncompliance to the Internal Revenue Service. LHA shall promptly correct physical-condition and other LIHTC findings, accurately document the date and scope of correction, respond to the monitoring agency, and notify the owner entity, investor or syndicator, lender, counsel, and tax advisor when required. Staff shall not promise that correction will prevent, withdraw, or amend a Form 8823 filing.

Response Stage	Required Control
Finding validation	Confirm property, building identification number when applicable, unit/building scope, cited requirement, date, and correction period.
Resident protection	Address immediate safety, access, relocation, and communication needs without waiting for tax-credit review.
Correction package	Include work orders, invoices, photographs, permits, licensed-professional evidence, certifications, resident notices, and completion dates as applicable.
Owner/investor notice	Follow partnership agreement, management agreement, loan documents, regulatory agreement, and insurance notice

Response Stage	Required Control
	requirements.
Agency submission	Use the required Florida Housing method and deadline; retain complete submission and delivery confirmation.
Post-submission	Track agency acceptance, additional requests, continuing noncompliance, correction reporting, and final closeout.

26.3 Replacement Reserve and Capital Funding Escalation

Funding Need	Escalation Requirement
Routine repair within operating capacity	Property manager approval under budget and procurement authority; retain ordinary work-order evidence.
Unbudgeted or material repair	Owner representative and finance review; identify permissible operating, insurance, warranty, reserve, or other funding.
Replacement-reserve withdrawal	Follow regulatory agreement, loan documents, partnership agreement, lender/investor approval, and Florida Housing requirements before commitment or reimbursement.
Emergency life-safety work	Take authorized emergency protective action; document procurement basis; pursue required ratification, reserve, insurance, or owner approvals.
Systemic or recurring capital need	Update capital plan and reserve analysis; evaluate scope, procurement, relocation, accessibility, and Board/owner approvals.

27. Annual Board Reporting, Executive Administration, MTW, and Legal Construction

27.1 Annual and Exception-Based Board Reporting

Management shall provide the Board at least annually with a consolidated physical-condition compliance report. Material life-safety, scoring, regulatory, funding, litigation, resident-displacement, or portfolio risks shall be elevated sooner when warranted.

Reporting Area	Minimum Content
Public Housing	Inspection status, REAC/NSPIRE results, health and safety closeout, technical reviews, recurring deficiencies, and capital escalations.
Voucher programs	Inspection volume and status, overdue LT/severe/moderate corrections, HAP enforcement, owner trends, accommodation/LEP controls, and quality-control results.

Reporting Area	Minimum Content
Florida Housing/LIHTC	Monitoring status, open findings, response deadlines, agency closeout, Form 8823-related notices known to LHA, reserve/capital actions, and investor/lender escalations.
RAD/mixed finance	Post-conversion inspection status, capital obligations, recurring deficiencies, owner/agent performance, and layered compliance risks.
Enterprise controls	Training completion, tool validation, policy changes, audit findings, unresolved risks, and corrective-action status.

27.2 Interim Administrative Guidance

The Executive Director / President & CEO may issue written interim procedures, forms, assignments, and technical instructions needed to implement controlling law or agency guidance, protect residents, preserve funding, or correct an operational gap. Interim guidance may not waive a mandatory requirement, materially reduce resident rights, alter a Board-approved policy choice, or avoid a required public process. A substantive change shall be presented to the Board when required.

27.3 MTW Reservation

Where an approved MTW waiver, activity, Operations Notice authorization, or other HUD approval lawfully modifies a requirement, LHA shall administer the approved MTW authority to the extent stated in the approval. MTW status does not waive requirements that remain applicable, and staff shall retain the approval, applicability analysis, effective dates, resident/public process, and implementing procedure in the policy file.

27.4 Severability and Controlling Authority

If any provision of this policy is held invalid, unenforceable, or inconsistent with controlling law, the remaining provisions shall remain effective to the fullest extent permitted. Federal law and binding HUD requirements control for HUD programs; Internal Revenue Code Section 42, Treasury regulations, Florida Housing requirements, and governing transaction documents control for LIHTC and Florida Housing programs within their respective scope. LHA shall process a conforming amendment when required.

Appendix K. ACOP and Policy Crosswalk

ACOP / Operating Area	NSPIRE Policy Cross-Reference
Unit inspections and entry	Sections 5, 6, 8, 20.2, and Appendix I
Maintenance and work orders	Sections 13, 14, 20.2, 20.3, and 20.7
Housekeeping and resident-caused conditions	Sections 7.2, 10, 20.3, and 20.6
Emergency conditions and transfers	Sections 7, 9, 11, 16, and 24
Grievances and due process	Sections 16, 17, 20.4, and 27.4
Reasonable accommodation and accessible units	Sections 16 and 23

ACOP / Operating Area	NSPIRE Policy Cross-Reference
Capital planning and modernization	Sections 20.7, 25, and 26.3
Records, privacy, and quality control	Sections 13, 14, Appendices B, E, F, I, and J

Appendix L. Property-Specific Program and Inspection Crosswalk

Required Field	Property Entry
Property / address / project number	
Ownership and management entities	
Public Housing, HCV/PBV, RAD PBV, RAD PBRA, LIHTC, HOME, SAIL, bond, or other layers	
Inspection authority and standard	
Inspection frequency and sample method	
Scoring or pass/fail method	
Correction, certification, and appeal requirements	
Accessible-unit and Section 504 profile	
Regulatory agreements and record-retention periods	
Lender, investor, syndicator, contract administrator, and agency notices	
Replacement-reserve and capital approval requirements	
Responsible LHA official and backup	

Appendix I. Public Housing NSPIRE/ACOP File Checklist

- ☐ Property, building, unit, and inspectable area identified.
- ☐ Inspection type and authority identified.
- ☐ Resident notice or emergency-entry basis documented.
- ☐ Deficiencies classified and linked to work orders.
- ☐ Life-threatening conditions received immediate protective action.
- ☐ Correction evidence and supervisory verification complete.
- ☐ REAC report and correction certification reconciled, when applicable.

- ☐ Technical or administrative review evaluated within the applicable deadline.
- ☐ Reasonable accommodation, LEP, grievance, or transfer issue routed correctly.
- ☐ Systemic conditions routed to preventive maintenance or capital planning.
- ☐ Final closure approved and retained.

Appendix J. Florida Housing/LIHTC Inspection Response Checklist

- ☐ Property-specific funding and regulatory profile current.
- ☐ Florida Housing notice and inspection date logged.
- ☐ Buildings, units, common areas, accessibility features, and life-safety items prepared for review.
- ☐ Agency findings transcribed exactly into the corrective-action log.
- ☐ Response deadline and responsible person assigned.
- ☐ Work orders, photographs, invoices, permits, and certifications assembled.
- ☐ Supervisory verification completed.
- ☐ Investor, syndicator, lender, owner entity, and counsel notified when required.
- ☐ Response submitted by the controlling deadline with proof of delivery.
- ☐ Agency acceptance, follow-up, or unresolved finding recorded.
- ☐ Recurring findings included in root-cause and preventive-maintenance review.
- ☐ Closeout package retained under the longest applicable retention period.

Appendix A. Deficiency Response and Enforcement Matrix

Condition	Deadline	Verification	If Not Corrected
Life-Threatening	24 hours after owner notification	Priority on-site or other reliable authorized verification	Immediate escalation and applicable HAP/safety enforcement.
Severe	30 calendar days unless approved extension	On-site or authorized evidence based on risk	Initiate applicable HAP enforcement and notices.
Moderate	30 calendar days unless approved extension	On-site or authorized evidence based on risk	Initiate applicable HAP enforcement and notices.
Low	Informational unless other law applies	Not required for pass closure unless directed	Preventive maintenance/outreach as appropriate.
Lead/other overlapping law	HUD standard plus separate controlling legal timeline	Method required by controlling lead or safety rule	Apply NSPIRE and separate legal remedies.

Appendix B. Inspection File Checklist

- ☐ Inspection type and controlling standard identified.
- ☐ Notice and access documentation complete.
- ☐ Unit, inside, and outside associated-area scope documented.

- ☐ Each deficiency includes exact location, description, classification, and deadline.
- ☐ Smoke alarm and carbon monoxide requirements evaluated.
- ☐ Lead-based paint applicability evaluated.
- ☐ Results notice delivered to owner and family.
- ☐ Correction evidence linked to each deficiency.
- ☐ Extension approval, if any, includes justification and revised deadline.
- ☐ HAP/family enforcement completed when triggered.
- ☐ Reasonable accommodation and language access documented.
- ☐ QC review completed when selected.
- ☐ Closure date and basis recorded.

Appendix C. Owner and Family Notice Content Checklist

Notice	Required Content
Pre-implementation notice	What NSPIRE is; LHA date; scope; smoke/CO emphasis; owner/family responsibilities; assistance contacts.
Inspection appointment	Date/time window; access; areas; preparation without cosmetic demands; accommodation/LEP contact.
Results notice	Outcome; findings; responsible party; correction deadlines; evidence; consequences; review rights.
LT notice	Immediate hazard; 24-hour deadline; protective action; emergency contact; verification requirement.
Enforcement notice	Uncorrected item; action and effective date; cure/verification; owner/family rights and next steps.

Appendix D. Inspector Field Protocol

1. Confirm property/unit and controlling standard.
2. Review known accommodation, communication, and safety needs without unnecessary disclosure.
3. Inspect applicable unit, inside, and outside associated areas systematically.
4. Use objective NSPIRE deficiency criteria; do not substitute cosmetic preference.
5. Capture clear location-specific notes and evidence.
6. Identify immediate hazards and initiate required notification during the inspection workflow.
7. Review findings for classification and deadline accuracy before release.
8. Securely upload and synchronize the completed record.
9. Escalate ambiguity; do not improvise a local standard.

Appendix E. Quality Control Review Form

Review Item	Yes / No / N.A.	Reviewer Notes
Correct inspection type and standard		

Review Item	Yes / No / N.A.	Reviewer Notes
Scope of associated areas appropriate		
Findings supported by observable evidence		
Severity and pass/fail accurate		
Deadlines calculated correctly		
Smoke/CO/lead requirements addressed		
Notices complete and timely		
Verification adequate		
Enforcement initiated when required		
Accommodation/LEP handled appropriately		
Record is complete and auditable		

Appendix F. Training and Competency Record

Employee / Contractor	Role	Training Date	Knowledge Check	Observed Inspection	Approved By

Appendix G. HUD Notification Record

Field	Entry
PHA name	Housing Authority of the City of Lakeland, Florida
PHA code	FL011
Actual/planned implementation date	_____

Field	Entry
HUD notification date	_____
HUD Field Office copied	_____
HUD confirmation received	_____
Record location	_____
Completed by	_____

Appendix H. Executive Readiness Certification

I certify that, based on the documented readiness review, Lakeland Housing Authority has completed the policy, training, communication, technology, transition, quality-control, and enforcement preparations necessary to begin applicable NSPIRE inspections on the implementation date shown below. This certification does not waive or alter any HUD requirement.

Certification Item	Entry
NSPIRE implementation date	_____
HUD notification completed	☐ Yes ☐ No
Owner/family notification completed	☐ Yes ☐ No
Inspectors approved for assignment	☐ Yes ☐ No
Tool and forms validated	☐ Yes ☐ No
Legacy cases segregated	☐ Yes ☐ No
Mock workflow passed	☐ Yes ☐ No
Open risks and mitigation attached	☐ Yes ☐ No

Benjamin Stevenson, Executive Director / President & CEO

Signature: _____ Date: _____

Carlos R. Pizarro, Senior Vice President / Implementation Coordinator

Signature: _____ Date: _____

- HUD NSPIRE Technical Review Guidance and current electronic submission requirements.
- 24 CFR part 8; Section 504, ADA, Fair Housing Act, UFAS or other applicable accessibility standards and HUD guidance.

- Current RAD Notice and approved transaction documents for RAD PBV, RAD PBRA, RAD/Section 18 blend, and other repositioning structures.
- Internal Revenue Code Section 42, Treasury Regulation §1.42-5, IRS Form 8823 and current agency guidance.
- Florida Housing Compliance Guidebook, forms, regulatory agreements, extended use/LURA documents, loan documents, and program-specific requirements.

Source and Authority Register

- HUD Notice PIH 2026-18, Implementation of NSPIRE Administrative Procedures for Voucher Programs, issued July 15, 2026.
- 24 CFR part 5, subpart G; 24 CFR parts 35, 882, 982, and 983, as applicable.
- HUD NSPIRE Final Standards and current NSPIRE standards webpage.
- HUD HCV/PBV NSPIRE checklist and successor tools or guidance.
- LHA FY 2027 Annual Agency Plan package, Resolution No. 26-1575.

FINAL LEGAL AND HUD VALIDATION Before execution and HUD submission, LHA should confirm the implementation date, any approved variations or alternative methods, current Administrative Plan cross-references, public-process requirements, and consistency with the current HUD standards and notices.

