

HUD Announces Delays to HIP and NSPIRE-V Rollouts

No Update Given on HOTMA Compliance Date



Over the summer, HUD has announced implementation delays for two key departmental initiatives—the Housing Information Portal (HIP) and the expansion of the NSPIRE inspection protocol to the Housing Choice Voucher (NSPIRE-V) and other HUD programs. As of press time, there is no revised implementation timeline for HIP, while the compliance deadline for the NSPIRE expansion has been pushed to October 1, 2025.

BOTH HIP AND NSPIRE IMPLEMENTATION will have many implications for day-to-day PHA operations. HIP is the successor system to IMS/PIC, and PHAs must be using the HIP system to comply with Sections 102 and 104 of the Housing Opportunity through Modernization Act of 2016 (HOTMA). In April 2024, HUD published the HIP implementation notice PIH 2024-12 (HA) (https://bit.ly/3zkojA3), which outlined that PIC would shut down at some point in "late summer" and that HIP would be operational in "fall 2024." This notice is now rescinded.

Meanwhile, NSPIRE (the National Standards for the Physical Inspection of Real Estate) intends to align many different HUD inspection protocols into a single standard. Since July 2023, HUD has been inspecting both public housing and multifamily properties using the new NSPIRE standards. The Department intended to greatly expand the use of NSPIRE later this year, but that effort is now delayed.

Given the uncertainty surrounding implementation of these key programs, PHADA will continue to keep its members apprised of the latest news through the *Advocate*, Breaking News, eBlasts, and social media posts. The Association's upcoming 2024 Legislative Forum in Washington, DC, will also feature informative panels on these and other important topics.

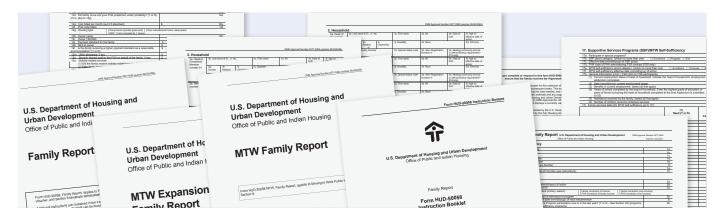
"Technical Issues" Cited for HIP Delay

In a June 17, email to PHA Executive Directors (https://bit.ly/3KZ9mJd), General Deputy Assistant Secretary (GDAS) Dominique Blom announced that HUD was formally rescinding the HIP implementation notice. Blom noted that "a new [HIP] schedule is necessary to ensure that our programs do not experience interruptions in service," and that "HUD is resolving technical issues encountered in... testing."

Summary Points

- HUD recently announced the deferred implementation of two key initiatives: the rollout of the Housing Information Portal (HIP) and the expansion of NSPIRE to Section 8, Community Planning and Development, and homelessness programs.
- In early July, the Department formally rescinded the HIP implementation notice, and as of press time has not published a revised rollout timeline.
- Despite the delayed HIP implementation, HUD has not yet formally postponed the compliance date for Sections 102 and 104 of the Housing Opportunity through Modernization Act of 2016 (HOTMA).
- HUD has also postponed the compliance date for implementing NSPIRE inspections for the Housing Choice Voucher (HCV), Project-Based Voucher (PBV), and other programs to October 1, 2025.
- PHADA will continue to keep members updated about the latest on HIP, HOTMA, NSPIRE, and other key Departmental initiatives through its newsletter, social media, and at our 2024 Legislative Forum in September.

The HIP delay email does not provide a revised implementation timeline, nor does it specify when the Department will share a new timeline with HAs. Instead, it commits to "not shut[ting] down the IMS/PIC system until the new HIP system is thoroughly



and successfully tested and ready for PHAs to use."

Even with the delayed HIP implementation, there are actions PHAs should continue taking to prepare for the eventual HIP transition. These include:

- Reporting data into PIC as usual.
- Cleaning up data, resolving fatal errors, and ensuring data accuracy.
- Continue to submit applications to the Special Applications Center (SAC) as necessary. The announced closure of the SAC on July 1, 2024, will not occur.

No Updates on HOTMA Compliance Date

As noted earlier, PHAs must be onboarded into HIP before they can begin complying with Sections 102 and 104 of HOTMA. This is because the HOTMA-related income calculation changes

require substantial revisions to the 50058 forms, and PIC is not capable of receiving the updated forms. Interested parties may find updated, HOTMA-compliant versions of the 50058 forms on HUD's HOTMA resources page (https://bit.ly/201d1zD).

The compliance date for HOTMA Sections 102 and 104 is January 1, 2025, and the email announcing the HIP

delay only promises "future guidance" regarding any revisions to that date. It also notes that HAs should not begin using the HOTMA-compliant 50058 forms until the Department provides additional details regarding the HIP rollout schedule.

Given the uncertainty surrounding the HIP implementation schedule, it is exceedingly doubtful that any agencies will have migrated to the new system before the current HOTMA compliance date of January 1, 2025. In fact, it appears unlikely HUD will be able to have the HIP system ready anytime in the first half of 2025. For that reason, PHAs can expect to continue to use pre-HOTMA income certification policies for the months to come.

NSPIRE Expansion Delayed to 2025

In early July, HUD published a *Federal Register* notice (https://bit.ly/461qGHf) extending the NSPIRE compliance date to October 1, 2025, for several Departmental programs, including:

 Project Based Vouchers (PBV) and Section 8 Moderate Rehabilitation (Mod Rehab)

- Housing Choice Vouchers (HCV)
- HOME Investment Partnerships Program (HOME),
 Housing Trust Fund (HTF), and Housing Opportunities for Persons with AIDS (HOPWA)
- Emergency Solutions Grants (ESG) and Continuum of Care (CoC) funding

HUD justifies this extension to provide additional time to PHAs, participating jurisdictions, and grantees to implement the NSPIRE standards, including added time to train staff and communicate with landlords. The delay will also provide HUD with more time to develop and promulgate supplementary technical resources

This extension follows PHADA's advocacy to defer NSPIRE-V implementation until issues encountered in the public housing

and multifamily programs are resolved, to avoid reducing landlord participation in the HCV program. While not specifically cited as a reason for the NSPIRE-V deferral, increasing landlord participation is a key departmental priority. HUD's own research has shown that over 5,000 landlords left the HCV program every year from 2010–2020, and that 51 percent of

landlords list "any inspection issues" as motivation for non-participation.

Though compliance has been further delayed, HUD encourages agencies to implement NSPIRE at their earliest convenience. PHAs that implement NSPIRE prior to the new compliance date must email: NSPIREV_AlternateInspection@hud.gov with a courtesy copy to the Field Office. The email's subject line must read "Notification of Extension of HQS, [PHA code]" and the body of the email should include the PHA name, PHA code, and the date on which the PHA tentatively plans to implement NSPIRE.

Readers should note that the NSPIRE delay does not impact the new statutory requirement for installing carbon monoxide devices and hardwired or tamper-resistant battery powered smoke alarms. These requirements apply to all HUD programs (including public housing and vouchers). The NSPIRE Standards will be updated for these requirements before their statutory compliance date of December 29, 2024.