October 21, 2019

Yardi Systems provides software to some of the largest affordable housing providers in the United States. We appreciate the opportunity to provide feedback regarding NSPIRE.

Although Yardi has no comment or opinion on any of the policy questions, we do have some observations and concerns regarding other items in the notice:

1.   Software vendors and many PHAs have already devoted significant resources to developing, testing, and providing feedback in the UPCS-V demonstration. The notice indicates that, once the NSPIRE protocol has been formalized, the findings will be promoted to the UPCS-V demonstration for further testing. We are concerned that the significant work already done on UPCS-V is not the basis of the NSPIRE model.

2.   The notice indicates that work orders will be part of the NSPIRE model. Currently, a HUD work order form does not exist, so there is no industry standard for reporting. Without standardization, any data collected will be difficult to report. Since most companies and agencies have been using work orders for years, altering procedures or requiring a new form will be a significant undertaking that could take years to develop and implement.

3.   Those of us who are responsible for providing software for agencies and companies would like an opportunity to provide feedback and ask questions during the development process. While we would not presume to provide guidance on policy, we have extensive experience with inspection and work order protocols and how to avoid potential software and reporting pitfalls. We will be in a better position to contribute to the conversation if we are given an opportunity to provide suggestions earlier in the process. We request that HUD have ongoing, publicly available technical meetings with interested parties.

Please feel free to contact me should any additional clarification be necessary.

Sincerely,
Gabrielle Van Horn
Director, PHA