



MANAGEMENT CORRECTIVE ACTION PLAN

In reference to Federal Awards Finding 2025-001:

The non-compliance resulted primarily from operational and system limitations rather than the absence of policy or guidance. The PHA had inspection procedures and documentation expectations in place and communicated to inspection staff; however, the inspection software that we use, Tenmast, currently does not adequately support printing, retention, tracking and follow-up of former HQS inspection documentation and present NSPIRE documentation, reinspection deadlines or enforcement actions.

As HUD oversight expectations increased and NSPIRE requirements were implemented, reliance on manual tracking and workarounds created a risk of incomplete documentation and delayed follow-up. While inspections were conducted as required, system constraints limited the PHA's ability to consistently document failed items, record actual passing dates and initiate timely enforcement actions, including HAP abatement.

To further strengthen compliance and address these risks, the PHA updated its Administrative Plan effective July 1, 2025, to more clearly define NSPIRE compliance standards, documentation requirements, reinspection timelines, enforcement procedures and abatement actions.

STEPS TO IMPROVE:

1. Reinforce NSPIRE inspection procedures previously issued to inspectors, including documentation, notification, reinspection and enforcement requirements.
2. Implement refresher training for inspection staff to ensure consistent application of HUD and PHA NSPIRE policies, including life-threatening and non-life-threatening deficiencies.
3. Require retention of complete HUD-52580 inspection reports for all failed and passed inspections, including accurate documentation of deficiency correction dates.
4. Strengthen review of inspection files to ensure timely follow-up, reinspection scheduling and enforcement actions by the Section 8 Director.
5. Transition inspection tracking and compliance enforcement from our current software company, Tenmast, to a new software company, Yardi, to improve system controls, documentation retention and monitoring capabilities. This implementation should occur in 2026.
6. Apply the updated Administrative Plan effective July 1, 2025, to ensure consistent enforcement of HAP abatement and contract termination requirements.

Effective December 1, 2024, the PHA began utilizing NSPIRE to support a more modernized inspection system. Existing landlords were formally notified of the new inspection and enforcement requirements on September 1, 2024. The Section 8 Director will conduct periodic supervisory file reviews to verify that inspection notices, HUD-52580 reports, reinspection documentation and enforcement actions are properly maintained and timely.

If you are a person with a disability and you need assistance in complying with this request, please contact us at the number listed at the top of this page and let us know what we can do to help.

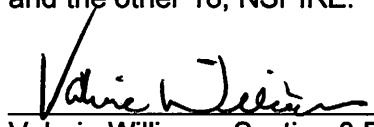


The PHA is currently in the process of implementing Yardi as its primary inspection and case-management system. Once fully operational, Yardi will provide enhanced capabilities for tracking failed inspections, monitoring reinspection deadlines, documenting compliance and enforcing HAP abatement in accordance with HUD and NSPIRE requirements. Management will utilize system-generated reports and ongoing internal reviews to identify and promptly address compliance issues.

The Section 8 Director acknowledges the deficiencies identified and is committed to strengthening NSPIRE enforcement through improved system controls, clarified policy, staff training and ongoing monitoring. These corrective actions are intended to ensure program integrity, protect tenant safety and maintain compliance with HUD regulations.

Additional Remarks:

Under our finding, the finding was reported for HQS Enforcement. Our agency changed to the NSPIRE Protocol for inspections as of 12/1/2024. Out of the 25 failed inspections sampled, 7 fell under the previous HQS protocol and the other 18, NSPIRE.



Valerie Williams, Section 8 Director
Housing Authority of Hopkinsville

