Colbert and Williams Consent Decree Programs
Policies and Procedures:
Bridge Subsidy Pre-Inspections by Prime Agencies

Policy Number:	P4.09
Subject:	Bridge Subsidy Pre-Inspections by Prime Agencies
Section:	P4 Housing Search
Scope:	Comprehensive Program and Front Door Diversion Program
Effective Date:	10/1/2021
Last Revision:	8/22/2025

POLICY STATEMENT

In the interest of reducing delays in the transition or post-diversion process, the Comprehensive Program and Front Door Diversion Program (FDDP) is offering Prime Agencies and FDDP Providers the option of conducting Bridge Subsidy pre-inspections for FDDP Participants and for initial Class Member transitions out of nursing facilities or SMHRFs. These pre-inspections must be completed by Prime Agency, FDDP Provider, or subcontractor staff who are certified to do Housing Quality Standards (HQS) or National Standards for the Physical Inspection of Real Estate (NSPIRE) inspections.

The purpose of the pre-inspection is to identify potential issues with the housing unit that would cause a unit to fail an HQS/NSPIRE inspection, and to work with the landlord to rectify these potential issues in a timely fashion. Once the pre-inspection passes, the Bridge Subsidy Administrator will make a rent offer to the landlord, and only then the Class Member or FDDP Participant will be allowed to sign the lease and move into the unit. The Bridge Subsidy Administrator will commence rent payments to the landlord once all documents are received.

The Bridge Subsidy Administrator will then schedule an inspection using their own personnel or contractors. If the unit fails at the time of the Bridge Subsidy Administrator's inspection, the landlord will have twenty-one (21) days to correct the issues and have the unit reinspected. The landlord should contact the Bridge Subsidy Administrator or their inspection vendor directly to schedule the re-inspection. If failed items are not corrected within twenty-one (21) days, the unit will go into abatement and payments will be placed on hold.

Prime Agencies or FDDP Providers who plan to take advantage of this pre-inspection process must, in advance, submit a list to IDHS of their staff who will be conducting pre-inspections, along with documentation of each staff's certification to complete HQS/NSPIRE inspections. IDHS will regularly share this list of HQS/NSPIRE certified staff with the Bridge Subsidy Administrators. Pre-inspections will not be accepted if completed by staff whose certification is not documented.

IDHS will discuss any discrepancies between pre-inspections and Bridge Subsidy Administrator inspections with Prime Agency or FDDP Provider pre-inspection staff. If multiple inspections conducted by the Bridge Subsidy Administrator fail even though the Prime Agency or FDDP Provider staff reported that the pre-inspections passed, or if inaccurate information is provided to the Bridge Subsidy Administrator during this process, IDHS may determine that Prime Agency or FDDP Provider staff may no longer conduct pre-inspections. This determination may affect individual staff, an entire Prime Agency or FDDP Provider, or the Comprehensive Program as a whole.

Prime Agencies or FDDP Providers are not required to complete pre-inspections and may choose to complete the Bridge Subsidy Administrator inspection process as outlined in policy P4.03 Housing Search and Bridge Subsidy.

It is the expectation that all agencies develop and follow internal operating procedures surrounding consent decree activities. However, these internal procedures must align with IDHS policies and procedures.

PROCEDURES

1. The Prime Agency or FDDP Provider is responsible for conducting a thorough housing search as described in policy P4.03 Housing Search and Bridge Subsidy, through Step 5 under "Housing Search Procedures."
    a. The Prime Agency or FDDP Provider must submit forms 4.3 Bridge Subsidy Administrator Referral and 4.4 Bridge Subsidy Participation Agreement to the Bridge Subsidy Administrator when they begin the housing search with the Class Member or FDDP Participant. These forms must be filled out completely and signed for the Bridge Subsidy Administrator to verify Class Member or FDDP Participant eligibility and identify any potential issues.
    b. If the Class Member or FDDP Participant does not have income, the Prime Agency or FDDP Provider should also submit form 4.11 Certification of Zero Income to the Bridge Subsidy Administrator at this time.
    c. Delays in submitting forms 4.3 and 4.4 may result in the Prime Agency or FDDP Provider no longer being eligible to conduct pre-inspections.
2. Once the Class Member or FDDP Participant has been approved for occupancy in a housing unit, but before a lease is signed, the Prime Agency or FDDP Provider may choose to have their HQS/NSPIRE-certified staff conduct the pre-inspection.
    a. The pre-inspection must be clearly documented on form HUD-52580-A, Housing Choice Voucher Program Inspection Form, or NSPIRE HCV/PBV Inspection Checklist.
    b. If any elements of the pre-inspection result in a "Fail" outcome, the Prime Agency or FDDP Provider should work with the landlord to have the deficiencies corrected and conduct another pre-inspection once the landlord reports that the deficiencies are resolved.
    c. Once all applicable elements of the pre-inspection are marked as "Pass," the Prime Agency or FDDP Provider should work with the landlord to have all required ownership and tax documents completed, as identified by the Bridge Subsidy Administrator. Each Bridge Subsidy Administrator has their own packet of landlord documents. The Prime Agency or FDDP Provider should request the current packet from the relevant Bridge Subsidy Administrator.
3. Within two (2) business days of the passed pre-inspection, the Prime Agency or FDDP Provider must submit the following completed documents to the Bridge Subsidy Administrator, with signatures where required:
    a. HUD-52580-A Housing Choice Voucher Program Inspection Form or NSPIRE HCV/PBV Inspection Checklist
    b. 4.7a Bridge Subsidy Pre-Inspection Notice, with accurate information about utilities
    c. 4.10 Bridge Subsidy Waiver Request (if applicable)
    d. Completed landlord documents
4. Once all the required documents are received by the Bridge Subsidy Administrator, they will make a determination about rent reasonableness, ensure that any necessary waivers are approved, and make a rent offer to the landlord within two (2) business days.
5. Once the landlord has accepted the rent offer, the Class Member or FDDP Participant may sign the lease with a start date no earlier than the date of the passed pre-inspection.

a. A copy of the signed lease must be returned to the Bridge Subsidy Administrator along with the completed HAP Contract.
b. Once the Bridge Subsidy Administrator has received the signed lease and HAP Contract, they will begin issuing rent payments to the landlord.
c. The Class Member or FDDP Participant may move into the unit after the lease is signed.

6. The Bridge Subsidy Administrator will schedule an inspection using their own staff or contractors within thirty (30) days of receiving the signed lease and HAP Contract.
    a. The Prime Agency or FDDP Provider and Class Member or FDDP Participant are responsible for ensuring that the Bridge Subsidy Administrator inspectors can access the property at the scheduled appointment time.
    b. If the Bridge Subsidy Administrator inspection results in a "Fail" outcome, the landlord will have twenty-one (21) days to correct the deficiencies.
    c. If the deficiencies are not corrected within twenty-one (21) days, the Bridge Subsidy Administrator will place a hold on any further payments to the landlord until the inspection passes.
    d. The Bridge Subsidy Administrator is not responsible for payment delays caused by a failed inspection or missing/inaccurate documentation. Prime Agencies or FDDP Providers must work with landlords and Class Members to ensure that units pass the HQS/NSPIRE inspection.
    e. Repeated instances of deficiencies being uncovered during the Bridge Subsidy Administrator inspection that were not identified during the pre-inspection may result in IDHS determining that Prime Agency or FDDP Provider staff are no longer permitted to conduct pre-inspections.

RELATED CLINICAL DOCUMENTS

- HUD-52580-A Housing Choice Voucher Program Inspection Form
- NSPIRE HCV/PBV Inspection Checklist.
- 4.3 Bridge Subsidy Administrator Referral
- 4.4 Bridge Subsidy Participation Agreement
- 4.7a Bridge Subsidy Pre-Inspection Notice
- 4.10 Bridge Subsidy Waiver Request
- 4.11 Certification of Zero Income

Current versions of policies and clinical documents are available in the WebApp Library or at https://colbert-williams.nursing.uic.edu/.

RELATED POLICIES

- P4.03 Housing Search and Bridge Subsidy

REVISION & APPROVAL HISTORY

Revision Number	Revision Date	Nature of Revision	Approved By
1	9/24/2021	New procedure	A. Johnson
2	7/14/2023	Reviewed and updated for FY24 procedures. Definitions removed from policy and added to CCMTP Policy Definitions document	V. King
3	7/26/2024	Annual review to include FDDP program language and updates to HUD's new inspection standards	T. Fuller
4	8/22/2025	Removed 'DMH' in reference to IDHS	M. Miller-Attang
5			