



EBLL Response in  
HCV Units:  
**Index Unit**





EBLL case reported for  
a child under age six in  
an HCV unit...

**What now?**





EBLL case reported  
for a child under age  
six...

What now?

**Verify!**



Immediately verify the EBLL with a health care provider or local public health department, if original report did not come from one of those sources.

- Who:* PHA
- What:* Verifies the EBLL with health care provider or public health department
- When:* Immediately
- How:* Need not be written verification



EBLL case reported  
for a child under age  
six...

What now?

**Verify!**

- **What if the child has moved by the time the PHA receives verified report?**
  - If the child identified as having an EBLL is no longer living in the unit when the PHA receives the verified EBLL report, but another household receiving tenant-based rental assistance is living in the unit or is planning to live there, EBLL response requirements still apply.



EBLL case reported  
for a child under age  
six...

What now?

**Verify!**

- **What if no initial medical verification is received?**
  - Try to verify with health care provider or health department.
  - Make at least two attempts to verify.
  - Keep records of their attempts to verify the EBLL.



EBLL case reported  
for a child under age  
six...

What now?

**Verify!**

## • **HCV Data Matching and Sharing - 24 CFR 35.1225(g)**

- Quarterly data sharing and data matching with the health department is a requirement of the LSHR that predates the 2017 amendment.
- PHAs can share a list of HCV addresses with the health department or the health department can share addresses for children with EBLL to the PHA.
- PHA must ensure this information is protected, maintained as confidential, and is used only for the public health protection of children and families from lead exposure.
- PHA must keep records of attempts to comply with data matching requirement.



EBL case reported  
for a child under age  
six...

What now?

**Verify!**

- **Information shared by the PHA should not include the child's name or blood result, unless done in a secure manner.**
  - This is considered personally identifiable information (PII), and is also confidential medical information that must be maintained in accordance with the PHA's policy for private medical information.
  - If the PHA must transmit PII, it shall be done in a secure manner or in an encrypted email.
  - For more information on Privacy Protection Guidelines for PHAs, see PIH 2015-06.



EBLL case verified...  
**What now?**



EBLL case verified...  
What now?

**Notify!**



Notify the local HUD Field Office, HUD OLHCHH (LeadRegulations@hud.gov), and the local health department within five business days of receiving verified report.

- Who:* Owner
- What:* Notifies HUD and local health department
- When:* Within five business days of receiving a verified EBLL report or verifying an EBLL report
- How:* HUD recommends using email, but do not include child's name or test results.



EBLL case verified...  
What now?

**Notify!**

- **What to include in notification to HUD Field Office and HUD Office of Lead Hazard Control and Healthy Homes:**
  - PHA code and name (if PHA providing info) OR owner name and address (if owner providing info)
  - Date of EBLL test result
  - Housing program (e.g., HCV)
  - Unit address and (if in multi-unit property) the development name
  - Whether the PHA or owner has notified the local health department of the EBLL, or been notified by the local health department, and the date of that notification



EBLL case verified...  
What now?

**Investigate!**



Ensure that a certified Lead-Based Paint (LBP) Risk Assessor performs an environmental investigation (EI) in the child's home and common areas within 15 calendar days of receiving verified report.

- Who:* PHA (and certified LBP risk assessor)
- What:* Certified LBP Risk Assessor performs an EI
- When:* Within 15 calendar days of receiving verified report
- How:* Find certified assessors by contacting the state lead licensing agency or visit [www.epa.gov/lead](http://www.epa.gov/lead). For details on how to do an EI, see Chapter 16 of the *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing*, available on HUD's website.



EBLL case verified...  
What now?

**Investigate!**

## • Risk assessors and inspectors

- Certified lead-based paint **risk assessors** may perform environmental investigations, inspections, post-abatement clearances, lead hazard screens, and risk assessments.
- Certified lead-based paint **inspectors** are trained to identify lead-based paint on surface-by-surface basis.
- The EI must be performed by a certified lead-based paint **risk assessor**.



EBLL case verified...  
What now?

**Investigate!**

- **Can the health department do the EI?**
  - Yes, many local public health departments conduct lead poisoning prevention services or can arrange for such services.
  - The health department may evaluate a child's home for lead-based paint hazards and other possible sources of lead exposure when a child is found with an EBLL.
  - The PHA can rely on results of health department's evaluation.



Results of  
environmental  
investigation received...  
**What now?**



Results of  
environmental  
investigation  
received...  
What now?

**Notify!**



Notify local HUD Field Office and the family of the results. If lead-based paint hazards were identified, also notify all building residents that an EI was completed.

- Who:* PHA
- What:* Notifies HUD Field Office, EBLL family, and other building residents
- When:* Within 10 business days of receiving results for HUD Field Office, and within 15 calendar days for resident notifications
- How:* By letter or notice delivered to each unit, since central posting of EI notice could reveal private health information



Results of  
environmental  
investigation  
received...

What now?

**Notify!**

- Notices of evaluation to HUD and residents must include the date the investigation was completed, because the investigation is only valid for a year.



Results of  
environmental  
investigation  
received...

What now?

## Ask!



## Did the EI identify lead-based paint hazards?

- **If the EI identifies lead-based paint hazards in the index unit...**
  - The owner is responsible for controlling and clearing all hazards from housing sources.
- **If the EI does not identify lead-based paint hazards in the index unit...**
  - EBLL response for the index unit is complete after the PHA notifies the family of the results. PHA and owner should maintain records.



Results of  
environmental  
investigation  
received...

What now?

**Ask!**

- **What about non-paint hazards identified in the EI?**  
Residents should follow the EI's recommendations for controlling other household sources of lead (for example, imported jewelry or pottery).
- PHAs and owners can show the family the part of the EI that talks about non-housing hazards and let them know it is their responsibility to eliminate or control these hazards in their home.



Environmental  
investigation identified  
lead-based paint  
hazards...

**What now?**



Environmental investigation identified lead-based paint hazards...

What now?

**Ask!**



Is this unit in a property with multiple federally-assisted units?

- **If index unit is found to contain lead-based paint hazards,** additional evaluation is required for other assisted target housing units in the property where children under age six reside (known as other “covered units”).
  - The steps for other covered units in the property are covered in the next video segment.



Environmental investigation identified lead-based paint hazards...

What now?

# Control!



Correct and clear any lead-based paint hazards in unit and common areas within 30 calendar days of receiving EI results.

- Who:* Owner
- What:* Ensures a certified lead-based paint abatement or renovation firm controls lead-based paint hazards and completes clearance exam
- When:* Both control work and clearance must be completed within 30 calendar days of receiving EI results.
- How:* By relying on the certified assessor's expertise in all aspects of relocation, control, and clearance



Environmental  
investigation  
identified lead-  
based paint  
hazards...

What now?

**Control!**

- **Always use certified assessors and technicians:** Control work must be performed by a certified lead abatement or lead renovation firm.
- Abatement vs. Interim Controls?
  - Decision is up to the owner, but PHA can advise the owner that abatement reduces need for future reevaluation and hazard control work.



Environmental investigation identified lead-based paint hazards...

What now?

**Protect!**



Ensure that families are not exposed to lead hazards in housing as you do control work.

- Who:* Owner
- What:* Implements any necessary occupant protections
- When:* Before and during all control work
- How:* By relying on the certified assessor's or certified contractor's determinations for relocation, isolation, and protection requirements



Environmental  
investigation  
identified lead-  
based paint  
hazards...

What now?

**Protect!**

- **How to navigate these steps:** A certified lead-based paint abatement or renovation firm will have expertise on all aspects of relocation, control, and clearance. Follow their directions.
- Some types of work require complete isolation, or containment, of work area and/or full evacuation of residents and their belongings.
  - Other jobs require much less site preparation and containment.
- Temporary relocation is necessary if residents do not have access to kitchens and bathrooms during non-work hours.



Environmental  
investigation  
identified lead-  
based paint  
hazards...

What now?

**Protect!**

## • When is control work complete?

- All lead hazards identified in the course of the investigation should be eliminated or controlled.
- No interim control or abatement project is complete until compliance with clearance standards has been achieved, if required, and final report prepared.



Environmental  
investigation  
identified lead-  
based paint  
hazards...

What now?

**Protect!**

## • What is a clearance examination?

- Combined visual and quantitative environmental evaluation procedures to determine no lead-based paint hazards remain.
- HUD's *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing* provides a "Clearance Report Review Worksheet" with required fields.



Environmental  
investigation  
identified lead-  
based paint  
hazards...

What now?

**Protect!**

## • Who conducts a clearance examination?

- Clearance on all projects involving abatement (as defined by EPA) must be done by a certified risk assessor or a certified lead-based paint inspector.
- For properties covered by HUD's Lead Safe Housing Rule, clearance of non-abatement work may be performed by a certified risk assessor or lead-based paint inspector, or by a certified sampling technician.



Environmental investigation identified lead-based paint hazards...

What now?

**Notify!**



Notify all building residents that work is complete and of any hazard reduction activities undertaken. Also provide documentation to HUD Field Office.

- Who:* Owner
- What:* Notifies other building residents and local HUD Field Office of each hazard reduction activity completed
- When:* Notifies building residents within 15 calendar days and the local HUD Field Office within 10 business days of completion
- How:* By central posting or distribution to each unit, for building residents



All necessary environmental investigations, risk assessments, and control work are completed...

**What now?**



All necessary testing  
and control work  
completed...

What now?

**Maintain!**



Maintain the unit and common areas lead-safe for continued occupancy. Lead safe means no deteriorated paint or failed hazard control methods.

- Who:* Owner
- What:* At minimum, visual assessments by a certified inspector
- When:* Visual assessments at unit turnover and every twelve months



El revealed index unit in multi-unit property has lead-based paint hazards...

What now?

**Assess!**

- **Ongoing maintenance entails:**
  - Visual assessment for deteriorated paint, bare soil, and failure of any hazard reduction measures to be performed at unit turnover and every twelve months
  - Respond to and clear lead-based paint hazards identified in the assessments
- **If lead-based paint has been completely removed:**
  - No further requirements

# End of EBLL Response in HCV Units Segment 2

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Please continue to Segment 3:  
EBLL Response in Other Covered Units

