

Video Series on the Amended Lead Safe Housing Rule (LSHR)

Introduction (All Programs)

Slide 1: Video Series on the Lead Safe Housing Rule Amendment

Hello, I'm Dominique Blom, General Deputy Assistant Secretary for Public and Indian Housing at HUD. Welcome to this video series on recent changes to HUD's Lead Safe Housing Rule. In January 2017, HUD published the amended Lead Safe Housing Rule. The new rule changes how elevated blood lead levels are defined to match the guidelines for the Centers for Disease Control. The rule also establishes more comprehensive testing and evaluation procedures if a child in HUD-assisted housing is found to have an elevated blood lead level. These videos are designed to help public housing agencies and partners implement the amended Lead Safe Housing Rule in the public housing program, as well as the housing choice voucher and project-based voucher programs. Thank you for taking the time to watch these videos and read the accompanying fact sheets that we've produced. We hope that these resources will help your agency to quickly respond in any cases of elevated blood lead levels in your community. Thank you.

Hello, I'm Tara Radosevich from HUD's Office of Public and Indian Housing. Welcome to this video series on the Lead Safe Housing Rule (or LSHR) Amendment. Throughout this video series, you'll hear from me and from my colleague Stephen Kidd. We've created video segments so that you can choose which parts to watch based on your needs and programs.

Slide 2: Learning Objectives

We have three main learning objectives for this video series. First, you will learn about the scope, requirements, and key definitions of the Lead Safe Housing Rule amendment. Second, you will learn how to respond effectively and quickly to cases of elevated blood lead levels (or EBLLs, as we will call them) in your public housing, housing choice voucher, and project-based voucher programs. Finally, you will learn about other resources available to you – particularly the series of fact sheets HUD has produced – and will know where to go for additional help.

Slide 3: Topics Covered

The video series is organized into four topics and 10 video segments of 20 minutes or shorter. The "Introduction to Lead Hazards in Housing and the Lead-Safe Housing Rule" introduces the dangers of environmental lead poisoning and the role of the Lead Safe Housing Rule in preventing and responding to cases of lead poisoning. The remaining video segments provide detailed information on how to respond to cases of elevated blood lead levels in public housing, the housing choice voucher (or HCV) program, and the project-based voucher (or PBV) program.

For each program, we have developed three video segments—one on the basics of the amended Lead Safe Housing Rule (or LSHR); one on responding to cases of elevated blood lead level (or EBLL) in the index unit; and one on requirements for testing other units in a multi-unit building.

Slide 4: Key Acronyms

Key acronyms that we will be using in this video series are as follows: LSHR is the Lead Safe Housing Rule; PHA stands for public housing agencies; HCV refers to the housing choice voucher (or Section 8) program; PBV refers to the project-based voucher program; EBLL stands for Elevated Blood Lead Level; and EI stands for Environmental Investigation.

Slide 5: Overview of Lead Hazards in Housing

Let's continue with this introduction by reviewing what lead is and its effects on humans.

Slide 6: Health Effects of Lead

Lead is a highly toxic metal and affects virtually every system of the human body. At high exposure levels, lead poisoning can cause convulsions, coma, and death. While adults can also suffer from excessive lead exposure, the groups most at risk are children under age six and pregnant women. Even at low levels, exposure to lead can damage children's developing brains and nervous systems, causing reductions in IQ and attention span, reading and learning disabilities, hyperactivity, and behavioral problems. The vast majority of childhood lead poisoning cases go undiagnosed and untreated, because most poisoned children have no obvious symptoms. The bottom line is that there is no known safe level of lead exposure, so it is imperative for PHA staff to be familiar with the relevant lead regulations, to comply with them fully, and to respond swiftly to cases of child lead poisoning.

How on earth did such a toxic chemical come to be a common feature in homes and communities across the U.S.? Lead used to be a very useful ingredient in many industrial and commercial goods, and its wide use in the past now accounts for its ubiquity in today's industrialized societies. There are still many sources of lead in the environment and many ways that children can be exposed.

Slide 7: Household Sources of Lead

The foremost cause of childhood lead poisoning in the United States today is the lead-based paint (or LBP) found in older houses. Lead was a major ingredient in most interior and exterior house paints before 1950, with some paints containing as much as 50 percent lead by dry weight. Lead was first regulated in residential paint in 1972 and was effectively banned in 1978. However, lead hazards in and around homes are not just attributable to lead-based house paint. Lead emissions from leaded gasoline and industrial sources also contribute to lead levels in soil. And some areas have high lead levels in the soil due to factory and smelter emissions or deteriorating lead-based paint on steel structures, such as bridges.

Since it was so widely used in the 19th and 20th centuries, lead can come from a variety of sources in the home. Lead-based paint is most commonly found in homes built before 1978, particularly very old homes with original painted windows, doors, and trim. Other potential sources of lead in homes of any age include water pumped through lead pipes and certain imported items including clay pots, toys, jewelry, and home remedies.

Slide 8: Children and Lead Poisoning

Today, children in the United States are lead poisoned primarily through ingestion of lead-containing dust. This can happen when children put their hands or other lead-contaminated objects into their mouth, or directly eat paint chips in homes with peeling or flaking lead-based paint. Paint chips can taste sweet, so may be attractive to toddlers. Children can also become lead poisoned by playing in lead-contaminated soil.

A simple blood test can detect lead poisoning. A small blood sample is taken from a finger prick or from a vein. Lead levels in the blood are measured in micrograms per deciliter. How often children are tested for lead poisoning varies across the country. The American Academy of Pediatrics recommends that doctors and parents follow the recommendations of their state or local health department as to when and how often children should be tested.

Slide 9: Lead Safe Housing Rule (LSHR) and LSHR Amendment

Let's turn now to the Lead Safe Housing Rule and Lead Safe Housing Rule Amendment.

Slide 10: The Lead Safe Housing Rule (LSHR)

The requirements of the Lead Safe Housing Rule, including the 2017 amendment, can be found in the Code of Federal Regulations (CFR) at [Title 24 part 35](#). The Lead Safe Housing Rule is implemented in conjunction with other applicable federal, state and local regulations. This means that you should follow the regulations of States, tribes, or localities that are at least as protective as the Lead Safe Housing Rule. In other words, always defer to the strictest relevant regulation. For instance, some states or localities require abatement of paint below a certain height on walls where a young child resides, which the Lead Safe Housing Rule does not. In a case like this, you should follow that stricter, more specific local standard.

Slide 11: The LSHR (cont.)

As codified in the Lead Safe Housing Rule, your PHA is responsible for ensuring that federally-assisted units built before 1978 are free of hazards from lead-based paint. PHAs play a key role in execution and oversight of EBLR response steps. PHAs also promote lead-safe housing by providing tenants with lead disclosure forms and the "Protect Your Family from Lead in Your Home" pamphlet, and by conducting annual unit inspections.

Slide 12: Which Units Are Covered?

The Lead Safe Housing Rule uses the term "target housing" to specify the units it covers. Target housing refers to any federally-assisted or federally-owned housing built before 1978, with a few exceptions.

Slide 13: Which Units Are Exempt?

Units exempt from the Lead Safe Housing Rule are those constructed after January 1, 1978 (the date when lead paint was banned in the United States), zero-bedroom units and single room occupancies (or SROs), and housing for the elderly or for persons with disabilities (unless a child less than age six resides or is expected to reside in the unit).

“Expected to reside” is the phrase the Lead Safe Housing Rule uses to refer to actual knowledge that a child will reside in a 0-bedroom dwelling unit or in a dwelling unit reserved or designated for the elderly and/or persons with disabilities. This covers cases where there’s actual knowledge a child will reside in the dwelling unit. For example, if there’s a pregnant woman living in the home.

Slide 14: Exemptions (cont.)

Other exemptions from the Lead Safe Housing Rule are properties found to be lead-free by a lead-based paint inspection; properties where all lead-based paint has been identified, removed, and cleared (except where enclosure or encapsulation was used); and unoccupied properties to be demolished.

Slides 15 - 17: The LSHR: Key Terms

Before moving further into the Lead Safe Housing Rule, it will be helpful for us to review some of its key terms and concepts. Target housing, as we already mentioned, is housing constructed prior to 1978 and not exempted from the Lead Safe Housing Rule. Assisted units refers to target housing assisted under Sections 8 and 9 of the United States Housing Act of 1937.

The index unit is the unit where a child with an elevated blood lead level resides. As such, the index unit is where the EBLL response steps begin. But under the amended Lead Safe Housing Rule, there are additional testing requirements that apply to other target units on the property. To distinguish between the requirements for the index unit and the other units covered by the Lead Safe Housing Rule, the rule uses the phrase “covered unit” or “other covered unit.” Other covered units are units subject to the Lead Safe Housing Rule that are not the index unit.

Another term the Lead Safe Housing Rule uses is the designated party. The rule uses “designated party” to identify the person or entity responsible for responding to elevated blood lead levels. In public housing, the designated party is the public housing authority. In the tenant-based voucher program, the PHA is the designated party for some requirements, and the property owner is the designated party for other requirements. For project-based voucher units, the designated party is the property owner.

Slide 18: Introduction to EBLLs and EBLL Response

We’ll now finish up by discussing elevated blood lead levels and the Lead Safe Housing Rule.

Slide 19: EBLL Threshold

Prior to the 2017 amendment, the Lead Safe Housing Rule required designated parties to take action after one blood draw showing 20 or more micrograms of lead per deciliter of blood. This threshold was defined as the Environmental Intervention Blood Lead Level (or “eye-bull”). The 2017 amendment replaced the term EIBLL with the term EBLL. The definition of EBLL is pegged to the Centers for Disease Control and Prevention’s “reference range” for elevated lead in the blood. Consistent with the CDC’s current guidance, HUD is using the reference level of 5 micrograms per deciliter to identify children with an EBLL. The CDC may revise this level again in the future, and if so, HUD will update its EBLL definition via the notice and comment process. Keep in mind, though, that if a state or local government establishes more protective standards for lead in children’s blood and homes, PHAs must follow these more protective standards.

Once a confirmed concentration from a venous blood draw has been reported, this EBLI case triggers a series of action steps to be taken by the designated party or parties. We'll discuss these action steps in-detail over the remainder of this video series to help you respond to EBLI cases in your public housing, housing choice voucher, and project-based voucher programs.

Slide 20: Key Resources

As you prepare to respond quickly and effectively to future EBLI cases in your jurisdiction, there are some great resources available to guide you along the way. In the program-specific segments to follow, we will reference many of these resources. But we'll take the time here to introduce these key resources and where you can access them.

First, we have the [Lead Safe Housing Rule](#) itself. If you're ever unsure about a responsibility of yours under the rule, please refer back to the regulation itself to see the original language and what it calls for. The Lead Safe Housing Rule provides the definitive language, but HUD has produced other resources to help you interpret the rule. One of these resources is [Notice PIH 2017-13](#), which HUD released in 2017 and specifically pertains to EBLI response. This notice provides comprehensive guidance on your EBLI response requirements.

Another useful resource is HUD's "[Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing](#)," (or Guidelines, as we will refer to it). This document, produced by HUD's Office of Lead Hazard Control and Healthy Homes, provides technical information on how to identify lead-based paint and related hazards in housing, and how to control such hazards safely and efficiently. The Guidelines include a detailed chapter on responding to EBLIs, and quite a bit of information for certified risk assessors. You can access the Guidelines at the URL on your screen.

Slide 21: Key Resources: Fact Sheets

Finally, along with this video series, HUD has produced a set of fact sheets to guide PHA staff and property owners through the Lead Safe Housing Rule's EBLI response steps. These fact sheets provide a general overview of the responsibilities and timelines for EBLI response, and also link readers to helpful resources on the web. Fact sheets for public housing, project-based vouchers, and housing choice vouchers can be accessed [online](#) or printed out for distribution among your staff.

Slide 22: Program-specific Video Segments

This concludes the introductory section of the Lead Safe Housing Rule Amendment video series. Now that we've introduced you to the basics of lead hazards in housing, the Lead Safe Housing Rule, and its key definitions, we recommend that you move on to the program-specific EBLI response sections. These three sections are designed for PHA staff working in the public housing, HCV, and PBV programs, respectively. In short video segments, we will go step-by-step through the PHA's response to a reported EBLI case in each housing program. For each step, we will go through who is responsible for completing the step, what tasks are involved, what is the timeframe for completing the step, what methods must be used to complete the step, and what units the step affects. Thank you for joining us. Please continue to the section specific to your program.