

Lead-Based Paint Regulations: Subpart M

Tenant-Based Rental Assistance



Trainers

Kris Richmond, ICF
Les Warner, ICF

HUD OLHCHH Staff





Series Overview

Goals for this Training Series

- Gain a deeper understanding of the Federal Lead-Based Paint Regulations
- Introduce key terms
- Determine the types of HUD assistance and/or HUD programs that trigger the requirements of Subparts H, L or M
- Review the key documentation requirements (i.e. evaluation, hazard control, notification, ongoing maintenance, continuing compliance)
- Provide a tour of the available resources

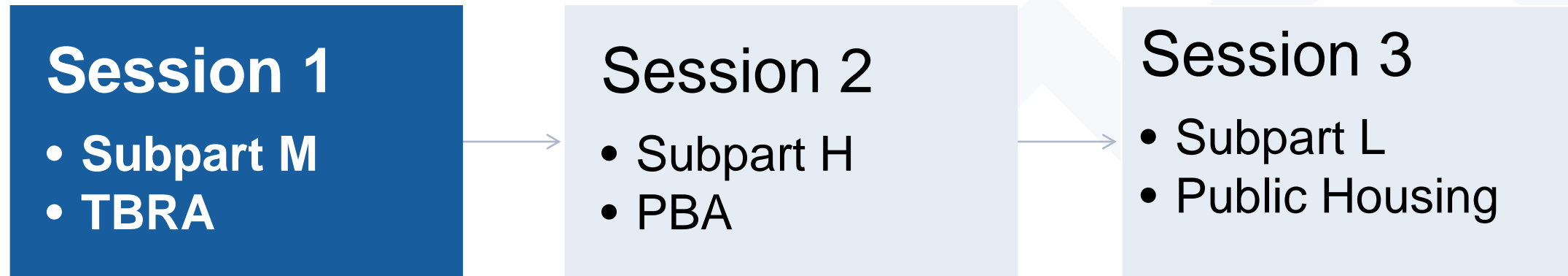


Webinar Series Format

- Three hours today to review materials
- One hour tomorrow for answering questions
 - With exercises (as applicable)
- Links of recordings will be available



Webinar Series Agenda



You do not need to attend all the sessions. Only attend for the activities that you work on.



Handouts

- LSHR Definitions
- Lead Disclosure Rule
- EPA's Renovation, Repair and Painting Rule
- Summary of Lead Based Paint



How experienced are you with the lead regulations?

A. I am new to applying lead regulations

B. I have some experience with applying lead regulations

C. I know how to perform all the key steps in the lead-based paint compliance process

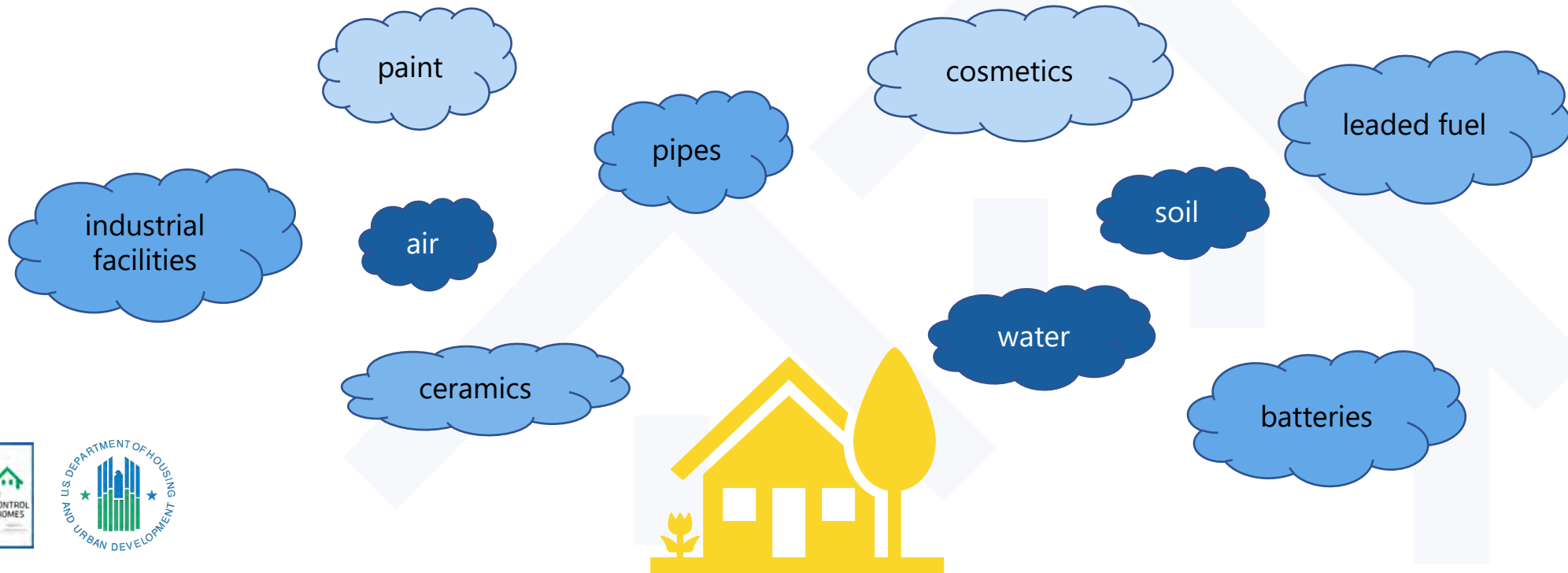


The background is a solid teal color. Overlaid on this are faint, light-green geometric shapes. On the left, there are two stylized house outlines made of thick lines. On the right, there is a large, faint arc representing a rising sun or a protective shield.

Lead Safe Housing Rule Basics

Defining the Problem

- Lead is a naturally occurring element and in manufactured products
- Found in all parts of our environment:



Defining the Problem

Who is at highest risk?

Children under age 6

- Bodies absorb more lead are more sensitive to effects than adults
- More likely to accidentally ingest lead

Pregnant women

- Elevated blood lead level can expose the developing child

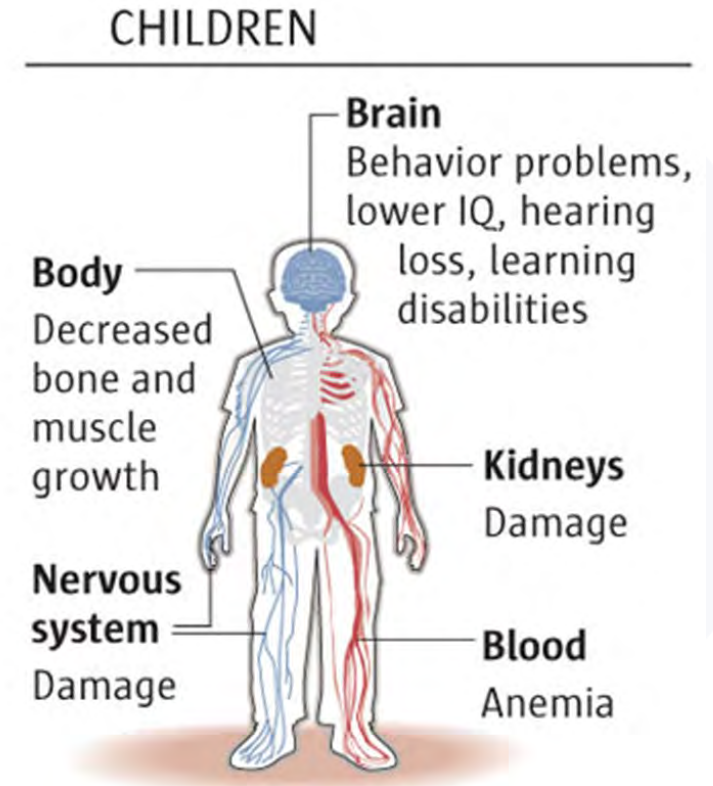
Certain workers

- Workers in certain construction and industrial fields may be exposed to high levels of lead – prevent “take-home” exposure



Children and Exposure to Lead

- How do children get lead in their blood?
 - Putting objects in their mouths
 - Playing in soil or floors with lead dust from friction and impact surfaces (doors, windows)
 - Eating paint chips
- What is the “trigger level” of lead in a child?
 - HUD: **5** µg/dL
 - CDC: 3.5 µg/dL



What does lead do to your brain?

<https://www.pbs.org/video/what-does-lead-poisoning-do-to-your-brain-aptmbo/>

Lead Safe Housing Rule (LSHR)



PURPOSE:

To protect children in assisted target housing through primary prevention

Target Housing defined: *Any housing constructed prior to 1978, except housing for the elderly or persons with disabilities or any zero-bedroom dwelling (unless any child who is less than 6 years of age resides or is expected to reside in such housing).*

Lead Regulations Apply **Except** When:

- Property constructed **after January 1, 1978**
- Zero-bedroom units and SROs*
- Housing designated exclusively for the **elderly** (62 years old or older) or persons with **disabilities***
- Properties found to be **lead-free** by a LBP inspection or where all LBP has been identified, removed, and clearance achieved

*Exemption does not apply if a child under six years of age resides or is expected to reside in the dwelling unit



Lead Regulations Apply **Except** When:

- An **unoccupied property** that is to be demolished, provided that it remains unoccupied until demolition
- **Emergency Action** necessary to protect life, health and safety, or further damage to the structure (e.g., after a natural disaster or fire)
 - This exemption DOES NOT APPLY to restoration/rehabilitation of such damaged property



Limited Exception from Lead Safe Work Practices and Clearance

- Maintenance and repair activities that **does not disturb** painted surfaces
- Lead safe work practices are not required when minor maintenance or activities disturb painted surfaces that are less than de minimis* levels:
 - 2 sq. ft. per interior space
 - 10% of small component type
 - 20 sq. ft. for exterior work

** Note: HUD de minimis levels are more protective than the EPA RRP guidelines*



Federal Lead Regulations

**HUD –
24 CFR
Part 35**

- **Subpart A:** Lead Disclosure Rule ←
- **Subpart B:** General LSHR Requirements & Definitions
- **Subpart H, J, K, L, M:** LSHR Program Requirements ←
- **Subpart R:** LSHR Methods and Standards

**EPA –
40 CFR
Part 745**

- **Subpart F:** Lead Disclosure Rule ←
- **Subparts D, L, Q:** Lead-Based Paint Activities Rule ←
- **Subparts E and Q:** Renovation, Repair, and Painting (RRP) Rule

Note: HUD uses the confirmed blood lead level of 5 µg/dL, while the CDC recently lowered the reference value to 3.5 µg/dL. HUD will continue to take action for confirmed blood lead levels at 5 µg/dL at this time.



Federal Lead Regulations

HUD/EPA's Lead Disclosure Rule

- Applies to almost all housing, public and private, built before 1978.
- Effective March 1996 (except exemptions mentioned earlier)

HUD's Lead Safe Housing Rule (LSHR)

- Applies to almost all Federally–assisted and Federally-owned housing built before 1978.
- Effective September 2000

EPA's Renovation, Repair, and Painting (RRP) Rule

- Applies to almost all target housing, public and private, built before 1978, including child-occupied facilities such as schools and day-care facilities.
- Effective April 2010



HUD Regulation Subparts

Subparts	Assistance Type	Program
A	Disclosure of Known Lead-Based Paint Hazards Upon Sale or Lease of Residential Property	All
B	General Requirements and Definitions	All
C D	Disposal of Housing Project-Based Rental Assistance	Non-HUD Federal
F	HUD-Owned Single Family Property	SF Hsg
G	Multifamily Mortgage Insurance	MF Hsg
H	Project-Based Assistance	Hsg, PIH
I	HUD-Owned and Mortgagee-in-Possession Multifamily Property	MF Hsg



HUD Regulation Subparts by Programs

Subparts	Assistance Type	Programs
J	Rehabilitation	All
K	Acquisition, Leasing, Support Services, or Operation	CPD, PIH
L	Public Housing Programs	PIH
M	Tenant-Based Rental Assistance	PIH, CPD
R	Methods and Standards for Lead-Based Paint Hazard Evaluation and Hazard Reduction Activities	All
E, N-Q	Reserved	



Subpart M and Applicable Programs for 24 CFR 35

Subpart	Assistance	Programs
M	Tenant-Based Rental Assistance	<ul style="list-style-type: none">• Section 8 certificate and housing choice voucher programs (HCV)• HOME program• Continuum of Care program• Housing Opportunities for Persons with AIDS• Indian Housing Block Grant program

If you are only using TBRA for security deposits, follow Subpart K:

- [Lead Safe Housing Rule Webinar Series: Subpart K – June/July 2022](#)
- [Lead Safe Housing Rule Toolkit](#)



Key Definitions (ref. §35.110)

- **Target Housing** – built before 1978, with some exceptions
- **Lead-Based Paint Hazards**
 - Deteriorated LBP
 - Dust with lead-levels at or above the dust-lead hazard standard
 - Soil with lead-levels at or above the soil-lead hazard standard
 - Friction, impact or chewable surfaces with LBP and an associated dust-lead hazard
- **Lead-Based Paint** – paint or other surface coatings that contain lead equal to or exceeding 1.0 mg/cm²

Resource – Lead Definitions Handout

<https://files.hudexchange.info/resources/documents/LSHR-Lead-Definitions-Handout.pdf>



Designated Party for LSHR Response

- **Designated Party:** Responsible for applicable LSHR requirements

Subpart M	TBRA	Owner/Grantee
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Key Actors

- Owners and Managers
 - May include in-house inspection and maintenance personnel
 - Maintenance and repair contractors
 - Renter Intake
- Program staff
 - Compliance staff, Finance Dept
 - Ideally the Specification Writer (In-house or not) will be qualified as a certified Risk Assessor
 - Training is often an eligible cost
- Lead specialists
 - Certified paint inspectors, risk assessors (RA), and clearance examiners
 - Certified or trained lead contractors, lead abatement supervisors, and RRP workers



Role of Property Managers

Property managers play a key role in lead safety too

- EPA will enforce LBP safety requirements against property managers
- RRP applies to property management companies
- <https://www.epa.gov/newsreleases/epa-hold-building-managers-responsible-lead-based-paint-safety-requirements>

Property managers = anyone supporting the maintenance role (PHA, management companies)



Key Steps in LBP Compliance Process for TBRA



DISCLOSE

- Pamphlet



LOOK

- Visual assessment



TREAT*

- Paint stabilization



CLEAR*

- Clearance



TELL

- Notification



MAINTAIN

- Ongoing maintenance

Summary of LBP Requirements

	<p style="text-align: center;">Tenant-Based Rental Assistance* [Subparts A, B, M, & R]</p> <p>*These requirements apply to TBRA units occupied or to be occupied by children under 6 years of age and the common areas and exterior painted surfaces associated with these units</p>
Disclosure (almost all pre-1978 units regardless of occupancy)	Owner is responsible for providing Protect Your Family pamphlet, disclosure form, and available records and reports to residents at initial occupancy, when their lease is renewed with changed terms, and/or when their lease is renewed after new information on LBP or LBP hazards becomes available.
Exemptions	See list of property exemptions under the Lead Safe Housing Rule.
Approach to Lead Hazard Evaluation and Reduction	Identify and stabilize deteriorated paint
Pre-Renovation Education (EPA Requirement)	Entity performing any rehabilitation, repair, or lead hazard reduction must provide <i>EPA RRP Renovate Right</i> pamphlet to residents prior to start of work.
Lead Evaluation or Visual Assessment	Visual assessment
Lead Hazard Reduction	<p>Paint stabilization</p> <p>Safe work practices & occupant protection</p> <p>Work must be performed by personnel with proper training or supervisor</p>
Clearance and Notification	<p>Clearance is required following abatement, interim controls, and paint stabilization (<i>unless area controlled or stabilized is de minimis</i>)</p> <p>Notice to occupants describing hazard reduction activities including clearance.</p>
Ongoing Maintenance	<p>Annual visual assessment to check for failure of lead hazard reduction work or defective paint.</p> <p>Safely repair deteriorated paint (<i>unless no LBP present</i>) and pass clearance. Safely repair any failed lead hazard reduction work, pass clearance, and provide notice to residents.</p>
EBLL Requirements	If a child discovered with an EBLL, promptly notify HUD, verify if not reported by a health care provider, notify health dept., conduct an environmental investigation and use interim controls or abatement to address hazards. Conduct Risk Assessment on other assisted units with a child under age 6 residing or expected to reside and perform interim controls or abatement to address hazards, clearance, notification to residents and ongoing maintenance.
Options	<p>Test deteriorated paint.</p> <p>Use safe work practices only on lead-based paint surfaces</p>

Responsibilities for Costs Associated with Lead

There are costs related to testing and treating lead-based paint hazards.

The following are responsible for paying these costs:

- Designated Party (may be grantee, PHA) pays for Visual Assessment, Risk Assessment (if EBLL), clearance and periodic re-inspections;
- Owner pays for paint stabilization, any lead hazard reduction activities and ongoing maintenance.



A faint, light green graphic in the background. It features a stylized house shape on the left and a circular arrow pointing clockwise on the right, suggesting a process or cycle.

Step 1. Disclose

***Lead Disclosure
Rule***

Lead Disclosure Rules



- Applies to almost all pre-1978 for **sale** and **rental** units
- The Owner or Lessor:
 - Provides Pamphlet
 - Provides warning statement
 - Disclose KNOWN information
- Must be completed **BEFORE** any contract is signed

Disclosure Exemptions

Disclosure is exempt for the following:



Foreclosure

Sales of target housing at foreclosure



LBP Free

Found LBP free by a certified inspector (For leases)



Short Term Lease

100 days or less where no lease renewal/extension can occur



Previously Disclosed

Lessor previously disclosed all information required and no conditions have changed

The Wrong Disclosure

NOTIFICATION Watch Out for Lead-Based Paint Poisoning

Sources of Lead-Based Paint
The interiors of older homes and apartments often have layers of lead-based paint on the walls, ceilings, window sills, doors, and trim. Lead-based paint and primer may also have been used on outside porches, railings, garages, fire escapes, and lamp posts. When the paint is disturbed, it can become a real danger for babies and young children. Children may eat paint chips or chew on painted railings, window sills, or doors. Children can also ingest lead even if they do not specifically eat paint chips. For example, when children play on or dust particles containing lead, they may get these particles on their hands, put their hands into their mouths, and ingest lead.

Hazards of Lead-Based Paint
Lead poisoning is dangerous—especially to children under the age of seven (7). It can even cause blindness and even death.

Symptoms of Lead-Based Paint Poisoning
Has your child been especially cranky or irritable? Is he or she eating normally? Does he or she complain about headaches? Is your child unwilling to play? These may be signs of lead poisoning. If you believe your child has lead poisoning, you should take your child to the doctor. Because there are no symptoms that do not mean that you should not be concerned if you believe your child has lead poisoning.

Advisability and Availability of Blood Lead Level Screening
If you suspect that your child has eaten chips of paint or someone told you that your child has eaten paint chips, you should take your child to the doctor. If the test shows that your child has an elevated blood lead level, treatment is available. Contact your local health department for help. Lead screening and treatment are available through the Medicaid Program for those who are eligible. If you are not eligible for Medicaid, you should immediately notify the Community Development or other agency to which you are applying for rehabilitation assistance. If you are not eligible for Medicaid, you may be eligible for assistance to pay for blood lead level screening.

Precautions to Take to Prevent Lead-Based Paint Poisoning
You can avoid lead-based paint poisoning by performing some precautions. Look at your walls, ceiling, doors, door frames, and trim. If you see any of the following, you should take some things you can do immediately to protect your child:

- (a) Cover all furniture and appliances;
- (b) Get a broom or stiff brush and remove all loose pieces of paint from walls, window wells and ceilings;
- (c) Sweep up all pieces of paint and plaster and put them in a pay container. Do NOT BURY THEM.
- (d) Do not leave paint chips on the floor in window wells. Damp cloths can be used to pick up paint chips. Dust and dirt is easy to pick up.
- (e) Do not allow loose paint to remain within your children's reach.

Homeowner Maintenance and Treatment of Lead-Based Paint
As a homeowner, you should take the necessary steps to keep your home safe. Water leaks from faulty plumbing, defective roofs and exterior holes or cracks may admit rain and dampness into the interior of your home. These conditions should be corrected immediately. Before repainting, all surfaces should be thoroughly cleaned by scraping, sanding, or brushing the loose paint from the surface, then repainting with two coats of lead-free paint. Instead of scraping and repainting, the surface may be covered with other material such as wallboard, gypsum, or paneling. Beware of the use of heat or paint remover; could create a vapor or fume which may be hazardous. The dust can enter the body either by breathing it in or by getting it on the skin. If lead-based paint should take place when there are no children or pregnant woman on the premises. Simple painting over defective lead-based paint can make a big difference. Your actions and awareness about lead-based paint make a big difference.

Tenant and Homebuyer Responsibilities
You should immediately notify the management office or the agency through which you are renting the unit if the unit has flaking, chipping, powdering or peeling paint, water leaks from plumbing, or a defective roof. You should co-operate with the management office or the agency in the unit.

I have received a copy of the Notification entitled "Watch Out for Lead-Based Paint Poisoning" AND I have received a copy of the pamphlet, "Protect Your Family From Lead-Based Paint."

Printed name of recipient _____ Date _____

Signature of recipient _____

After carefully reading this notice, please detach this receipt and return it to your local housing authority, landlord, management office, or community development office.

RECEIPT

I have received a copy of the notice entitled:

Lead-Based Paint
Poisoning
Protect Your
Family From
Lead-Based Paint
Poisoning
January 1993

Print Full Name _____

Signature _____

Address _____

City _____ State _____ Zip _____

© U.S. GOVERNMENT PRINTING OFFICE:1993-351-558

Exhibit V



The Correct Disclosure

Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards

Lead Warning Statement
Housing built before 1978 may contain lead-based paint. Lead from paint, paint chips, and dust can pose health hazards if not managed properly. Lead exposure is especially harmful to young children and pregnant women. Before renting pre-1978 housing, lessors must disclose the presence of known lead-based paint and/or lead-based paint hazards in the dwelling. Lessees must also receive a federally approved pamphlet on lead poisoning prevention.

Lessor's Disclosure

(a) Presence of lead-based paint and/or lead-based paint hazards are present in the housing:

(i) _____ Known lead-based paint and/or lead-based paint hazards are present in the housing (explain): _____

(ii) _____ Lessor has no knowledge of lead-based paint and/or lead-based paint hazards in the housing.

(b) Records and reports available to the lessor (check (i) or (ii) below):

(i) _____ Lessor has provided the lessee with all available records and reports pertaining to lead-based paint and/or lead-based paint hazards in the housing (list documents below): _____

(ii) _____ Lessor has no reports or records pertaining to lead-based paint and/or lead-based paint hazards in the housing.

Lessee's Acknowledgment (initial)

(c) _____ Lessee has received copies of all information listed above.

(d) _____ Lessee has received the pamphlet *Protect Your Family from Lead in Your Home*.

Agent's Acknowledgment (initial)

(e) _____ Agent has informed the lessor of the lessor's obligations under 42 U.S.C. 4852(d) and is aware of his/her responsibility to ensure compliance.

Certification of Accuracy
The following parties have reviewed the information above and certify, to the best of their knowledge, that the information they have provided is true and accurate.

	Date		Date
Lessor	_____	Lessor	_____
Lessee	_____	Lessee	_____
Agent	_____	Agent	_____



States with modified disclosure form: MA, RI, DC



The Correct Disclosure

Lessor's Disclosure

(a) Presence of lead-based paint and/or lead-based paint hazards (check (i) or (ii) below):

Mark here if known (i) ☒ Known lead-based paint and/or lead-based paint hazards are present in the housing (explain).

Mark here if not known Options - If Lead is Known, List building parts that have lead or, indicate how you know lead/lead hazards are present. IE an Inspection report from March 2003 or a Risk Assessment from June 2006.

(ii) ☐ Lessor has no knowledge of lead-based paint and/or lead-based paint hazards in the housing.

(b) Records and reports available to the lessor (check (i) or (ii) below):

Mark here if there are reports (i) ☒ Lessor has provided the lessee with all available records and reports pertaining to lead-based paint and/or lead-based paint hazards in the housing (list documents below).

Use this space to list reports that are available. Also indicate what has been provided to the tenant, i.e. summaries of reports

Mark here if there are no (ii) ☐ Lessor has no reports or records pertaining to lead-based paint and/or lead-based paint hazards in the housing.

Lessee's Acknowledgment (initial)

Renter (c) ☒ Lessee has received copies of all information listed above.

Initials (d) ☒ Lessee has received the pamphlet *Protect Your Family from Lead in Your Home*.

Agent's Acknowledgment (initial)

If there is agent, Initial here (e) ☒ Agent has informed the lessor of the lessor's obligations under 42 U.S.C. 4852(d) and is aware of his/her responsibility to ensure compliance.

Certification of Accuracy

The following parties have reviewed the information above and certify, to the best of their knowledge, that the information they have provided is true and accurate.

Owner Signature and Date

Lessor _____ Date _____ Lessor _____ Date _____

Renter Signature and Date

Lessee _____ Date _____ Lessee _____ Date _____

Agent Signature and Date

Agent _____ Date _____ Agent _____ Date _____



Tenant Information - Tracking Children Under 6 Years Old

Responsibility for:

- Owner tracking children residing in unit
- Tenant informing owner about an elevated blood lead level child residing in the unit

Activity	Requirement
TBRA	Owners must track occupants under the age of 6 and request tenants to inform them if and when their child has an EBLL.

Resource - Owner's Guide to Identifying and Tracking Occupants and Expected Occupants

<https://files.hudexchange.info/resources/documents/LSHR-Owners-Guide-to-Identifying-Tracking-Occupants-Under-Six-Years-Old.pdf>



Tenant Instructions

The owner/landlord is **required to** instruct tenants to inform them of any deteriorated paint in the unit or common areas

The owner/landlord **can** also instruct tenants to inform them of:

- Children under 6 years old who are occupants or expected to reside (and EBLL cases)
- Encouragement to retain “Protect Your Family from Lead in Your Home”

Resource - Owner’s Guide to Identifying and Tracking Occupants and Expected Occupants:

<https://files.hudexchange.info/resources/documents/LSHR-Sample-TBRA-PBA-Resident-Instructions.pdf>



Sharing info with Health Dept

- Coordinate with public health department on a quarterly basis to determine if any EBLL children identified in TBRA units.
- Two options:
 - Requests addresses of children with an EBLL from the local or State Health Dept.
[Request for EBLL Children Addresses - Sample Letter](#)
 - Provides addresses of children living in TBRA units to the local or State Health Dept.
[Providing Addresses of Units Receiving TBRA to Health Department – Sample Letter](#)
- Special steps are taken when an occupant child under 6 years old in an assisted unit has a verified EBLL will be discussed later



Documentation

- ✓ Disclosure Form
- ✓ Tenant instructions
- ✓ Any tenants under the age of 6 (For TBRA)
- ✓ Communication with Health Department (For TBRA)



Knowledge Check

True or False?

Scenario: At lease renewal the owner needs to provide the disclosure notice again to the tenant. There has not been any changes to the household or the unit.



The background is a solid green color with faint, abstract geometric shapes in a slightly darker shade of green. These shapes include several large, interconnected zig-zag lines and a large, thin circular arc on the right side.

Step 2. Look

LBP Evaluation

LBP Evaluations

There are multiple types of LBP evaluations. The ones you must complete depends on the activity.

- For all, the personnel completing the evaluation **must** be certified
- **Visual assessment:** Inspector identifies deteriorated paint, paint chips, dust, and other debris
- **Lead-based paint inspection:** Determine if painted surfaces contain LBP using methods such as an XRF analyzer or lab analysis
- **Risk assessment:** Identifies LBP hazards through sampling of deteriorated paint, dust, bare soil (risk based), water (optional)



Evaluation Methods for TBRA per Subpart M

- Visual assessment at unit turnover
- For Maintenance: visual assessment annually or unit turnover (whichever is sooner)
- Visual Assessors must be certified in Visual Assessment. Can be staff or contractors –free online HUD training.

Resource – HUD Visual Assessment Training and Certification

<https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm>

Resource – Log of Visual Assessments

<https://files.hudexchange.info/resources/documents/LSHR-Visual-Assessments-Findings-Resolution.pdf>



Finding Appropriate Firms and Individuals

- RFP/RFQ should include specific information on:
 - License and certification requirements
 - Type of evaluation to be performed: Risk assessment, inspection, clearance, or combination
 - See [HUD Guidelines](#) for more information
- Some grantees and property owners/managers report they can not find trainers, contractors, paint inspectors, risk assessors, or clearance technicians they need
 - Locate [Certified Renovation Firms](#) and [RRP Training Providers](#) from EPA's [Lead homepage](#)
 - Some states have their own RRP Programs. See state agency for more info.
 - Contact the [local entitlement \(CDBG/HOME\) grantee](#) for referrals
 - Contact [Lead-Based Paint Hazard Control Grantees](#)



Locate Certified Lead Dust Sampling Technician Firms

Find a Firm

To find your nearest EPA certified firm, first select the type of company you're looking for (renovator or evaluation), then please enter either a complete address, or a Zip Code, or a City and State.

Discipline:

- ☐ Renovator
☒ Dust Sampling Technician

<https://cfpub.epa.gov/flpp/pub/index.cfm?do=main.firmSearch>

Location:

Example:

- 123 Main St., Anytown, ME, 20460
- 20460
- Anytown, ME
- Maine

Distance:

in miles

OR

State:

OR

Firm Name:

OR

Certification Number:

Example: NAT-1681-2

Search Firms



Visual Assessment

- An inspection by a trained personnel to identify deteriorated paint, paint chips, dust and other debris
- Online HUD Visual Assessment training is recommended for all housing counselors and inspectors – Easy and Important!
<https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm>
- Keep records (copy to owners, and occupants recommended)
- Documentation: [Visual Assessment Findings and Resolution Record](#)
 - Date of inspection
 - Document rooms and surfaces with deteriorated or damage paint in unit, common, and exterior areas
 - Consider taking pictures



Lead-Based Paint Inspection

- On-site investigation conducted by a certified lead inspector or risk assessor paint that will determine:
 - Whether lead-based paint is present in a house, dwelling unit, residential building, housing development, or child-occupied facility, including common areas and exterior surfaces
- If lead is present, it also determines:
 - Which building components contain lead-based paint.
 - The amount of lead in the XRF sample.
- A LBP Inspection does not identify where the LBP hazards are, or where lead-dust or soil lead hazards exist.



[Lead Based Paint Inspection Highlights Video](#)

EPA Regulations for LBP Inspection

LBP inspections must follow HUD, EPA, and state/local regulations

24 CFR 35.1320

- (a) *Lead-based paint inspections and paint testing.* Lead-based paint inspections shall be performed in accordance with methods and standards established either by a State or Tribal program authorized by the EPA under 40 CFR 745.324, or by the EPA at 40 CFR 745.227(b) and (h). Paint testing to determine the presence or absence of lead-based paint on deteriorated paint surfaces or surfaces to be disturbed or replaced shall be performed by a certified lead-based paint inspector or risk assessor.



New EPA Dust Hazard Standards Effective 1/6/2020

(Effective for EPA Authorized States 1/6/2022)

Media	New Lead Level – Risk Assessment	Old Lead Level – Risk Assessment
Paint	1 mg/cm ²	1 mg/cm ²
Dust (wipe sampling only; single-surface or composite) Carpeted Floors Hard Floors Interior Window Sills	10 µg/ft ² 10 µg/ft ² 100 µg/ft ²	40 µg/ft ² 40 µg/ft ² 250 µg/ft ²
Bare Soil: Bare soil in play areas Bare soil in non-play areas	400 ppm (µg/g) 1,200 ppm (µg/g)	400 ppm (µg/g) 1,200 ppm (µg/g)
Water (optional) – first draw, 250mL	20 ppb (µg/L)	20 ppb (µg/L)

Find out if you work in an EPA Authorized State:

<https://www.epa.gov/lead/lead-abatement-inspection-and-risk-assessment>



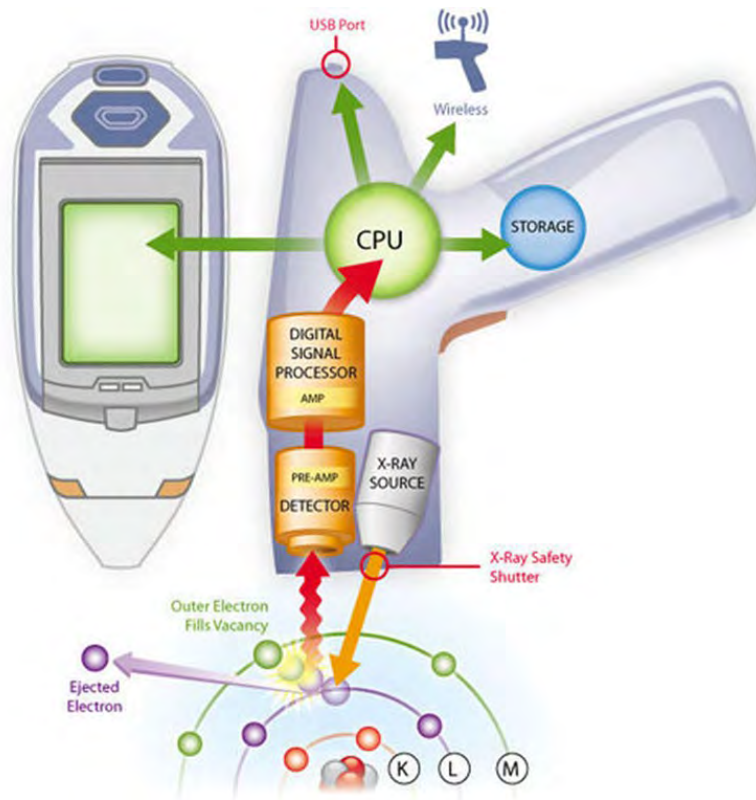
Risk Assessment

- On-site investigation to determine the existence, nature, severity, and location of LBP hazards
 - Must be conducted by a certified risk assessor
- Visual inspection to locate deteriorated paint, including extent and causes
- Background information on physical characteristics of dwelling and occupants' patterns that may cause LBP exposure to child < 6 years of age
- Test for presence on each friction or impact surfaces with deteriorated paint
- Dust samples from windowsills and floors
- Soil samples



[Lead-Based Paint Risk Assessment Highlights Video](#)

X-Ray Refractive Fluorescence (XRF) Device



Coming Soon: How to video on conducting a risk assessment

What is in a Risk Assessment Report?

A risk assessment report by the certified risk assessor or firm conducting the risk assessment explaining the results of the investigation and options for reducing LBP hazards

The report includes:

- Summary of the property, basic inspection information, and results
- Full explanation of testing methodology and results
- Lead hazard control plan
- Detailed laboratory analysis forms and data including XRF data

View details on the [Risk Assessment Report Checklist](#)



Lead Hazard Evaluation Notice

- Single-family buildings
 - Full report is provided directly to homeowner
 - If unit is tenant occupied, tenant receives notice of evaluation
- Multifamily buildings
 - Distribute to each household or post in central location where all residents can access it
 - Notice and reports of all evaluations must be made available to residents if requested.
- Notice must be provided within 15 days after results determined.

LEAD HAZARD EVALUATION NOTICE – SAMPLE FORM

Address: _____

Evaluation Completed (circle one): Paint Inspection Paint Testing Risk Assessment

Date: _____

Summary of Results:

_____ No lead-based paint or lead-based paint hazards were found.

_____ Lead-based paint and/or lead-based paint hazards were found. See attachment for details

Resource – Lead Hazard Evaluation Notice

<https://files.hudexchange.info/resources/documents/LSHR-Lead-Hazard-Evaluation-Notice-Sample-Form.pdf>



Documentation

- ✓ Certification of personnel who completed evaluation
- ✓ Visual assessment findings and resolutions log
- ✓ Report of LBP Inspection and/or Risk Assessment
- ✓ Lead Hazard Evaluation Notice





Step 3. Treat

***LBP Hazard
Reduction***

Lead Hazard Reduction & Treatment (Certifications Required)

Paint Stabilization

- Set of measures designed to remove and repair loose paint and damaged areas

Interim Controls

- Set of measures designed to reduce temporarily human exposure or likely exposure to lead-based paint hazards

Abatement

- Set of measures designed to permanently eliminate lead-based paint hazards
- Can be combined with interim controls



Lead Hazard Reduction & Treatment

Paint Stabilization

- Removing loose paint and other material from the surface to be treated
- Repairing any defects in the substrate of a painted surface causing paint to deteriorate
- Applying a new protective coating or paint
- Must be completed by a certified RRP certified contractors and renovators, abatement workers, and abatement contractors and supervisors



Contractor Selection for Hazard Reduction Work

- Staff check

Qualifications



- Contractors submit bids for work
- Program may opt to maintain list of pre-qualified lead contractors

Certifications



References



Note: It is the law (EPA RRP) that contractors are trained and certified if they work on any pre-1978 housing and/or child-occupied facilities regardless of funding source.

EPA Renovation, Repair and Painting Rule (RRP)

Contractors performing RRP projects that disturb lead-based paint in homes, childcare facilities and pre-schools built before 1978 must:

- Have their firm certified by EPA or an EPA authorized state
- Use certified renovators trained by EPA-approved training providers
- Follow lead-safe work practices
- Provide “Renovate Right” pamphlet
- VIOLATIONS: Civil Money Penalties \$41,056 /unit



Locate RRP Certified Renovator and Program Training Providers

RRP Certified Renovator

<https://cfpub.epa.gov/flpp/pub/index.cfm?do=main.firmSearch>

Find a Firm

To find your nearest EPA certified firm, first select the type of company you're looking for (renovator or evaluation), then please enter either a complete address, or a Zip Code, or a City and State.

Discipline:

- ☒ Renovator
☐ Dust Sampling Technician

AND

RRP Program Training Providers

<https://cfpub.epa.gov/flpp/pub/index.cfm?do=main.firmSearchAbatement>

Find a Course

To find available training course(s), first select the course, discipline and language, then select a state, from/to date range, and discipline. Additional training may be available, use the "Find a Trainer" tool and contact trainers regarding other course offerings.

Course:

- ☐ Initial
☐ Refresher

Discipline:

- ☐ Renovator
☐ Dust Sampling Technician

Location:

Example:

- 123 Main St., Anytown, ME, 20460
- 20460
- Anytown, ME
- Maine

Distance:

in miles

OR

State:

OR

Firm Name:

OR

Certification Number:

Example: NAT-1681-2

[Search Firms](#)



LSHR and RRP: Planning and Setting-Up

Requirement	HUD Lead Safe Housing Rule (LSHR)	EPA Renovation, Repair and Painting Rule (RRP)
Determination that LBP is present	Certified LBP inspector or risk assessor (not EPA testing kits)	Certified renovators use an EPA- recognized test kit
Training	<p>All workers and supervisors must complete a HUD-approved curriculum in lead safe work practices. Renovation firms must be certified. At least one certified renovator must be at the job or available when work is being done.</p> <p>Exception: Non-certified renovation workers need only on-the-job training if they are supervised by a certified LBP abatement supervisor who is also a certified renovator</p>	<p>EPA or <u>EPA authorized States</u> certify renovation firms and accredit training providers that certify renovators.</p> <ul style="list-style-type: none"> • Only the certified renovator is required to have classroom training. • Workers must receive on-the-job training from the certified renovator.
Pre-Renovation	HUD requires conformance with EPA regulations, including EPA's Pre-Renovation Education Rule	Education Renovators must hand out the <u>Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools</u> pamphlet.



LSHR and RRP: Work required

Requirement	HUD Lead Safe Housing Rule (LSHR)	EPA Renovation, Repair and Painting Rule (RRP)
Treating LBP hazards	Depending on type and amount of HUD assistance, lead hazards are treated using "interim controls" or "ongoing lead-based paint maintenance"	EPA generally requires that renovations in target housing be performed using lead safe work practices
Prohibited Work Practices	HUD prohibits 6 work practices: <ul style="list-style-type: none"> • EPA's 3 prohibited work practices plus <ul style="list-style-type: none"> • Heat guns that char paint • Dry scraping or sanding farther than 1 ft. of electrical outlets • Use of a volatile stripper in poorly ventilated space 	EPA prohibits 3 work practices: <ul style="list-style-type: none"> • Open flame burning or torching • Heat guns above 1100 degrees F • Machine removal without HEPA vacuum attachment
Threshold minimum amounts of interior paint disturbance which trigger lead activities	HUD has a more protective interior de minimis threshold than EPA for lead safe work practices. HUD also uses this lower threshold for clearance and occupant notification.	EPA's interior threshold for minor repair and maintenance activities is higher than HUD's de minimis threshold.



LSHR and RRP: After work completed

Requirement	HUD Lead Safe Housing Rule (LSHR)	EPA Renovation, Repair and Painting Rule (RRP)
Confirmatory Testing	HUD requires a clearance examination done by an independent, 3 rd party instead of the certified renovator's cleaning verification procedure	EPA allows cleaning verification by the renovator or 3 rd party clearance examination. The cleaning verification does not involve sampling and laboratory analysis of the dust.
Notification to Occupants	HUD requires the designated party to distribute notices to occupants within 15 days after lead hazard evaluation and control activities in/of their unit (and common areas, if applicable)	EPA has no requirement to notify residents who are not the owners after the renovation



Who Completes Abatement

- Certified abatement contractors and supervisors complete abatement
 - Abatement workers (If supervised by an abatement contractor)
- Completely removes lead-based paint or controls surfaces with treatments having a 20-year life expectancy
 - Removing lead-based paint and its dust
 - Permanently encapsulating or enclosing surfaces that contain lead-based paint
 - Removing/Replacing components that contain lead-based paint
 - Removing or permanently covering lead-contaminated soil



Using Lead Safe Work Practices - Must be Documented

- Lead Safe Work Practices are detailed methods for:
 - Controlling dust and debris
 - Using approved methods and worker protection
 - Protecting occupants
 - Segregating the work area and HVAC
 - Limiting access with possible relocation
 - Cleaning effectively
- Work wet, clean wet, clean with HEPA
- Must be followed by formal third-party Clearance inspection and Notice to residents

RRP Training Providers: <https://cfpub.epa.gov/flpp/pub/index.cfm?do=main.firmSearchAbatement>



Key Resources: Safe Work Practices

- [Safe Work Practices: Renovate Right Brochure](#)
- Control Dust, Segregate Work Area and HVAC, Work wet, Clean wet, Clean w/ HEPA vac
- [Interpretive Guidance](#)
 - #S4: Lead Safe Units
 - #R13: Interim Clearance
- Forms
 - [Post-Work Checklist for Lead Hazard Reduction Activities](#)
- [HUD Guidelines Chapter 8 Resident Protection and Worksite Preparation](#)



Occupant Protection During Lead Hazard Reduction

- Occupants and their belongings must be protected during lead hazard reduction work
 - Include requirements in any statement of work for contractor (if applicable)
 - May include leaving the unit or temporary relocation until clearance is achieved
- Temporary unit must be lead-safe
 - Use post 1978 units, or
 - Perform a clearance examination to document unit free of hazards
- For short term relocation the tenants could be housed in a hotel/motel and provided with meal vouchers
 - Longer timelines will require the temporary unit to be functionally equivalent
 - Multifamily rental projects can be staged to treat vacant units and then shift residents on-site



When is Relocation Required?

Relocation required:

- When tenants required to be out of the unit and cannot return until clearance is achieved
- If work area can be contained but resident will be restricted from needed parts of unit (kitchen, bathrooms) for more than an 8-hour workday

Relocation is **not** required:

- Work does not disturb paint
- Interior work completed in 1 period of 8 daytime hours
- Only exterior is treated
- Occupants have safe access to unit; treatment completed in 5 calendar days
- Elderly occupants, after consent

Resources

- [Interpretive Guidance](#) #J24: Elderly Consent
- [Guidance on Relocation](#)



Protection of Occupants' Belongings and Worksite Preparation for Projects with Lead Hazard Reduction Activities

Property Address: _____ Owner: _____

Name of Individual Completing this Form: _____

Organization: _____

Date Completed: _____

Instructions: Check all activities performed to protect occupants' belongings and prepare the worksite.

Whether or not temporary relocation of occupants is required before and during lead hazard reduction activities, the worksite must be carefully prepared and occupants' belongings protected. Check all that apply.

- ☐ Occupants were appropriately notified that their belongings would be protected during the work and what, if anything, they would need to do to prepare for the project.
- ☐ Occupants' belongings in the containment area were (check one):
 - ☐ relocated to a safe and secure area outside the containment area.
 - OR

Occupant Protection in Lead Hazard Reduction

Find more information in the Post-Work Checklist for Lead Hazard Reduction Activities:

<https://files.hudexchange.info/resources/documents/LSHR-Post-Work-Checklist-for-Lead-Hazard-Reduction-Activities.pdf>

Documentation

- ✓ Certification of personnel who completed hazard reduction
- ✓ Post-Work Checklist for Lead Hazard Reduction Activities
- ✓ Occupant Protection (if applicable)
- ✓ Project Monitoring
- ✓ Inspection Notes
- ✓ Statement of Work



The background is a solid green color. Overlaid on this are several abstract, semi-transparent geometric shapes in a slightly darker shade of green. These include a large, stylized 'A' shape on the left, a large circular arc on the right, and various other lines and smaller shapes scattered across the frame, creating a modern, architectural feel.

Step 4. Clear

Clearance – Documented by Certified Personnel

- Hazard reduction work is only complete upon passing a Clearance Examination
 - Assures work was done as specified and site is clear of hazards
- **Abatement** work - clearance must be performed by a certified risk assessor or lead-based paint inspector
- **Non-abatement** work - clearance can be done by a certified risk assessor or lead-based paint inspector or sampling technician (supervised and signed off by such)
- No conflict of interest
 - Clearance examiners must be independent from hazard control, rehabilitation, or maintenance work
 - May work for same firm that provides pre-work paint testing or risk assessment
- Interim Clearance to allow for non-lead workers to enter site is allowed, but Final Clearance is required



Clearance (cont.)

Includes:

- Visual assessment to determine completion of work, absence of hazards
- Dust sampling, (processed by accredited lab) to measure residual lead-dust levels
- Interpretation of sampling results
- Preparation of a report with certification included

If site fails:

- Worksite must be re-cleaned and
- Another clearance test conducted
- Additional work may be needed if continued clearance failure

[Lead-Based Paint Clearance Examination Highlights Video](#)

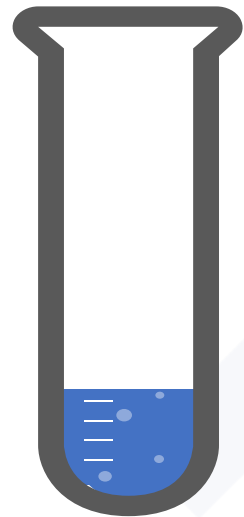


Clearance (cont.)

- Dust wipe samples must be collected (by certified risk assessor/inspector or his/her clearance technician) and submitted to an accredited laboratory for analysis
- LBP hazard control is not complete until clearance testing is performed and passed

Dust Clearance Levels

Carpeted Floors	10 µg/ft ²
Hard Floors	10 µg/ft ²
Interior Windowsills	100 µg/ft ²



Collected

Submitted

Passed testing



Documentation

- ✓ Certification of personnel who completed clearance
- ✓ Clearance Report





Step 5. Tell

Notice of Hazard Reduction includes Clearance Results



Occupants must receive a Notice of Hazard Reduction, within 15 days of completion of the work (pass Clearance)

- Activities performed
- Clearance Date
- Tech's ID Info, Contact info
- Visual Inspection Results
- Dust/Locations/ $\mu\text{g}/\text{sf}$
- Lab ID + #
- Reduction Dates
- LBP Remaining
- Contractor ID



Lead Hazard Reduction Notice

Sample Notice of Lead Hazard Reduction

Property Address: _____ Today's Date: _____

Summary of the Hazard Reduction Activity:

Start Date: _____ Completion Date: _____

Location and type of activity. (List the location and type of activity conducted or attach a copy of the summary page from the clearance report or the lead hazard scope of work providing this information.)

Date(s) of clearance testing: _____

Summary of results of clearance testing:

(a) _____ No clearance testing was performed.

<https://files.hudexchange.info/resources/documents/LSHR-Sample-Notice-of-Lead-Hazard-Reduction.pdf>



Sample Notice of Lead Hazard Reduction

Property Address: _____ Today's Date: _____

Summary of the Hazard Reduction Activity:

Start Date: _____ Completion Date: _____

Location and type of activity. (List the location and type of activity conducted or attach a copy of the summary page from the clearance report or the lead hazard scope of work providing this information.)

Date(s) of clearance testing: _____

Summary of results of clearance testing:

- (a) _____ No clearance testing was performed.
- (b) _____ Clearance testing showed clearance was achieved.
- (c) _____ Clearance testing showed clearance was not achieved.

List any components with known lead-based paint that remain in the areas where activities were conducted. List the location of the component (e.g. kitchen-door, bedroom-windows).

Person who prepared this summary notice

Printed Name: _____ Signature: _____

Title: _____ Organization: _____

Address: _____

Phone: _____ Fax: _____

Owner: _____ Date: _____
(Give to Property Owner with work-write up)

If you have any questions about this summary, please contact _____ at _____

Documentation

- ✓ Lead Hazard Reduction Notice
- ✓ Updated Disclosure Notice to provide tenant at lease renewal



The background is a solid green color with a large, faint, abstract geometric pattern. This pattern consists of several thick, dark green lines that form a series of interconnected zig-zags and curves, creating a sense of movement and depth. The lines are not perfectly straight, giving the pattern a hand-drawn or organic feel.

Ongoing Maintenance and Periodic Re-evaluation

Ongoing Maintenance

Remaining LBP	If any LBP remains after the lead hazard reduction , ongoing monitoring must be included as part of ongoing building operations to ensure that interim controls have not failed
Disclosures	Issued to new tenants prior to the execution of a lease along with the disclosures required with testing and clearance
Records	Maintained to document the initial lead hazard reduction or abatement work completed on all units and the ongoing efforts to maintain compliance
Deteriorated Paint	Identified by the visual inspection on interior and exterior surfaces located on the residential property shall be stabilized unless tested to determine it is not lead paint
Bare Soil	Treated with interim controls except for bare soil tested and determined no lead hazard
Safe Work Practices	Used when performing any maintenance or renovation work that disturbs LBP and clearance achieved
Failed Enclosure	Encapsulation or enclosure of LBP that have failed will need to be addressed and clearance achieved



Ongoing Maintenance for Units with Children under 6

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

Who	Owner/Operator/Program
What	<ol style="list-style-type: none">1. Ensures a trained visual assessor conducts visual assessments2. Responds to and clears new or deteriorated LBP hazards identified in the assessment3. Repairs any failure of abatement methods such as encapsulation or enclosure controls4. Written notice asking residents to report deteriorated paint and any failure of encapsulation or enclosure
When	Visual assessments every twelve months

***Ongoing maintenance not required if LBP was completely removed**



Documentation

- ✓ Report of any new evaluation
- ✓ Report of any new hazard reduction
- ✓ Clearance report
- ✓ Certification of all personnel who completed work
- ✓ Disclosure Notice (updated)



The background is a solid teal color. It features a large, faint, stylized house shape on the left side, composed of several thick, dark teal lines. To the right of the house is a large, faint, stylized sun or circular shape, also composed of thick, dark teal lines. The text is white and positioned in the lower right quadrant of the image.

Elevated Blood Lead Levels (EBLL) Response

EBLL Response Summary

- Once a child has been reported with an EBLL,
 - A verification and an Environmental Investigation (EI), must be carried out promptly.
 - Verifications, notifications, and additional unit evaluations may also be required as determined by the EI of the unit where the child with the EBLL resides (the index unit).
- If hazards are found, the other covered units in the property occupied by children under 6 years old have requirements requiring prompt action and recordkeeping.

Resource – Guide for Responding to a Report of a Unit with Child with EBLL

<https://files.hudexchange.info/resources/documents/LSHR-Owner-Guide-for-Responding-to-Report-of-an-Assisted-Unit-Occupant-Child-6-with-an-EBLL.pdf>



Key Terms

- **Covered Units:** HUD-assisted units where a child under age six lives or is expected to live
- **Index Unit:** A housing unit where a child with an elevated blood lead level resides
- **Other Covered Units:** Federally-assisted housing units in the property where a child under 6 years old lives or is expected to live.
- **Designated Party:** A federal agency, grantee, subrecipient, participating jurisdiction (PJ), housing agency, Indian tribe, tribally designated housing entity (TDHE), sponsor, or property owner responsible for complying with applicable requirements



EBLL Response

Activity	Timing	Documentation	Owner	PHA/Grantee
Verification, when necessary	ASAP			✓
Initial notification of confirmed case to HUD OLHCHH, HUD FO & public health dept.	5 business days after verification		✓	
Environmental Investigation (may be done by public health dept.	15 calendar days after verification			✓
Notification to residents	15 calendar days after results	Notice of evaluation	✓	
Lead hazard control on index unit	30 calendar days after EI result		✓	
Risk assessment and lead hazard control on other covered units	30-60 calendar days*		✓	
Clearance after work completed	30 calendar days after EI result 90 calendar days for > 20 units		✓	
Notification of clearance	10 business days to HUD FO 15 calendar days to residents	Notice of clearance	✓	
Notify HUD FO with documentation that activities are conducted	10 business days of deadline of each activity		✓	✓
Ongoing maintenance	Ongoing		✓	



leadregulations@hud.gov

- * Risk assessments of other covered units must be conducted within
- 30 calendar days for a property with ≤ 20 other covered units
 - 60 calendar days for a property with > 20 other covered units

EBLL Resources

Available LSHR Amendment Trainings

HUD offers two different trainings that provide an explanation of how Public Housing Agencies (PHAs), grantees, and owners respond to cases of EBLLs in children less than 6 years old living in a federally assisted housing unit.



Tenant-Based Rental Assistance

This training is intended for PHAs, grantees, and owners involved with Tenant-Based Rental Assistance (TBRA) programs (LSHR Amendment Subpart M). TBRA includes any relationship where HUD funding for rental is connected with a specific tenant such as a voucher program.

[View the LSHR TBRA Training](#)



Public Housing and Project-Based Assistance

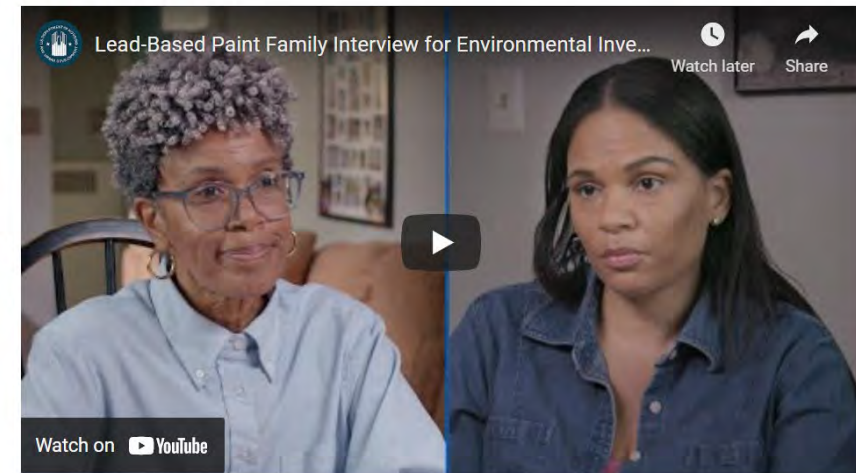
This training is intended for PHAs, grantees, and owners involved with administering conventional public housing (LSHR Amendment Subpart L) and Project-Based Assistance (PBA) rental programs (LSHR Amendment Subpart H). These programs cover HUD funds that are connected with a housing unit rather than a particular tenant.

[View the LSHR PBA Training](#)

<https://www.hudexchange.info/trainings/lead-based-paint/lshr/>

Lead-Based Paint Family Interview for Environmental Investigations Highlights

Learn about the family interview that is a key component of the lead-based paint (LBP) environmental investigation (EI) when a child tests positive for an elevated blood lead level conducted. The EI is conducted by a certified LBP risk assessor. This video provides information on the purpose, timing, and tips for how to complete a successful interview.



[Family Interview for EI Highlights Video](#)



Documentation

- ✓ Verification of child with EBLL
- ✓ Environmental investigation report
- ✓ Notification to residents of EBLL
- ✓ Risk assessment report
- ✓ Clearance report
- ✓ Notification of lead hazard reduction
- ✓ Certification of all personnel who completed work

Resource - Respond to a Child with EBLL Module

<https://www.hudexchange.info/programs/lead-based-paint/lshr-toolkit/respond-to-a-child-with-an-ebll/>



The background is a solid green color with a subtle, abstract pattern of lighter green geometric shapes. These shapes include several large, thin-lined triangles and a large, faint circular arc, creating a modern, architectural feel.

Program Administration and Monitoring

Program Administration and Review

Staff Knowledge

Provide training as needed and demonstrate that staff are knowledgeable about HUD's LSHR, the EPA RRP rule, and local program procedures for recordkeeping

Lead Safe Work Practices

Use video, pictures and on-site inspections to show work is completed using Lead Safe Work Practices anytime a painted surface larger than the de minimis amounts are disturbed

Occupant Protection

Document that temporary relocation required by the LSHR relocates tenants to units free of lead hazards and their belongings are protected

Monitoring

Document a consistent assessment of projects except for units that qualify for an exemption



Achieving Staff or Contractor Capacity

- Grantee or subrecipients need adequate LSHR knowledge to oversee procurement and implementation of projects triggering the LSHR
- Program can hire outside paint inspectors or risk assessors or have staff certified
- Procured capacity will trigger federal procurement following an RFP/RFQ process
- Grantees determines staffing for visual assessments, risk assessments, clearance testing, and the delivery of all required notices
- Staffing includes oversight of temporary relocation and ongoing monitoring



Owners and PMCs Must Manage & Monitor

- Follow procedures for completion of all required items
- Follow procedures and standards for the approval of contractor invoices, encouraging submission of documents and photographs and on-site and/or video inspection for files
- Institute periodic review by third party monitor
- For states and other remote grantees, update procedures to require electronic transmission of documents and video inspections

[More information in Ch. 24 of CPD Monitoring Handbook for LSHR](#)



Documentation

Every pre-1978 property should have a dedicated LSHR compliance file documenting all evaluations, reduction work, and notices

✓ Including certification of firms, contractors, or program staff

Resource – LBP Document Checklist

- <https://files.hudexchange.info/public/resources/documents/LSHR-LBP-Checklist-PBA-Single-Family-and-Multi-family-Under-5000-Per-Year.pdf>
- <https://files.hudexchange.info/resources/documents/LSHR-Lead-Based-Paint-Document-Checklist-PBA-5000-or-More-Unit-Year.pdf>
- <https://files.hudexchange.info/resources/documents/LSHR-Lead-Based-Paint-Document-Checklist-TBRA.pdf>



The background is a solid green color. It features several large, faint, abstract geometric shapes in a slightly darker shade of green. These shapes include a large 'Z' or zigzag pattern on the left, a large circular arc on the right, and several smaller rectangular blocks scattered throughout. The overall aesthetic is modern and minimalist.

**Available
Resources**

HUD Exchange Lead-Based Paint Page



Lead-Based Paint

Lead is a naturally occurring element found in air, soil, and water, but it can cause a range of health problems. When lead is absorbed into the body, it can damage the body's organ systems, especially the nervous system. Children under six years of age are at particular risk of damage to the brain and peripheral nerves because they are growing.

[Home](#) > [Programs](#) > [Lead-Based Paint](#)

Featured



Lead Safe Housing Rule Toolkit

The tools in the Lead Safe Housing Rule Toolkit help practitioners understand and comply with the federal lead rules. Use it to learn about preparing to administer projects, implementing key project tasks, and keeping records for compliance.

[View Toolkit](#)



Lead-Based Paint Resources

- [Lead Definitions Handout](#)
- [Lead Disclosure Rule](#)
- [LSHR-Renovation, Repair, and Painting Rule \(RRP\) Handout](#)
- [Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing](#)
- [Office of Lead Hazard Control and Healthy Homes](#)

[View more resources](#)



Lead Exposure

What do I do if I think my child or I have been exposed to lead?

Talk to your pediatrician, general physician, or local health agency about what you can do. Your doctor can do a simple blood test to check you or your child for lead exposure.

View the [Protect Your Family from Lead in the Home](#) pamphlet, [Childhood Lead Poisoning Prevention Program](#), or contact the [National Lead Information](#)




<https://www.hudexchange.info/programs/lead-based-paint/>

Lead Safe Housing Rule (LSHR) Toolkit

<https://www.hudexchange.info/programs/lead-based-paint/lshr-toolkit/introduction/>





- ☒ Introduction
- ☐ Lead Rule Basics
- ☐ Subpart H: Project-Based Assistance ≤ \$5,000
- ☐ Subpart H: Project-Based Assistance > \$5,000
- ☐ Subpart J: Rehabilitation Assistance
- ☐ Subpart K: Acquisition
- ☐ Subpart K: Leasing, Support Services, and Operations
- ☐ Subpart M: Tenant-Based Rental Assistance
- ☐ Hazard Reduction
- ☐ Respond to a Child with an EBLL



Lead Safe Housing Rule Toolkit

Introduction

The tools in the Lead Safe Housing Rule Toolkit help practitioners understand and comply with the federal lead rules. The rules apply to almost all ownership, rentals, and sales of pre-1978 housing regardless of occupants or federal assistance to keep children and families safe from lead.

Lead Rules Basics

If you are new to the lead regulations, review [Lead Rules Basics](#).

Choose the type of activity you are working in, or operating, to access the tools and information for that activity. If you are not sure which applies to you, view [Which Subpart Do I Use?](#)

Project-Based Assistance (PBA): Subpart H with A, B, and R

PBA rules and tools apply to rental properties receiving ongoing assistance that reduce occupants' rents. Assistance is tied

Evaluating Lead-Based Paint in HUD-Assisted Housing Videos

Inspection

Risk Assessment

Family Interview for Environmental Investigations

Clearance Examination

Reports

Lead-Based Paint Inspection Highlights

Learn the basics of how to complete a lead-based paint inspection in accordance with HUD's Lead Safe Housing Rule from certified lead risk assessors/inspectors and HUD's Office of Lead Hazard Control and Healthy Homes (OLHCHH). A lead-based paint inspection is used to determine and report the presence and location of lead-based paint in target housing.



Recording

Additional Resources

- HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (Chapter 7)
- XRF Performance Characteristics Sheets (PCS)
- Table 7.3 Number of Units to be Tested in Multi-family Building or Developments



Guidance and Performance Criteria

HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing

- OLHCHH has published two editions of the Guidelines, a technical manual for lead hazard evaluation and control in federally-assisted housing; cited by EPA in its lead rules as a “documented methodology.”

https://www.hud.gov/program_offices/healthy_homes/lbp/hudguidelines

FIGURE 5.4 Forms of Paint Deterioration



FIGURE 5.4a Peeling paint



FIGURE 5.4b Alligatoring paint

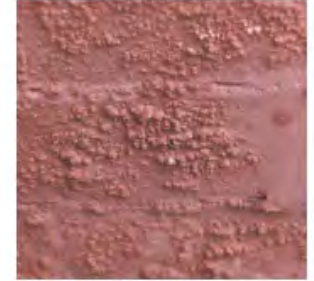
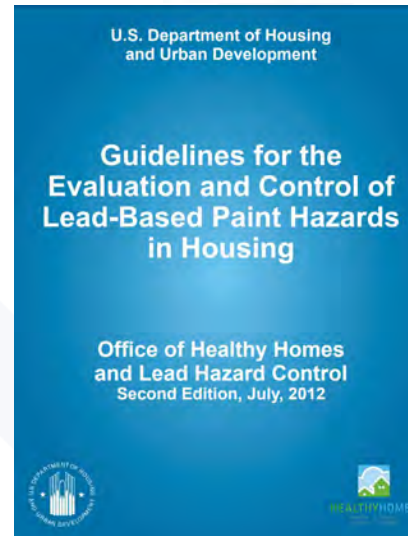


FIGURE 5.4c Blistering paint



Pictures from Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing



FIGURE 5.5 Baseboard showing a de minimis amount of deteriorated paint.



FIGURE 5.7 Impact surface on door and frame.



Lead Safe Housing and Healthy Homes Mailing List

Go to <https://www.hudexchange.info/maillinglist/>

Email Updates

Sign up to receive email updates on HUD policy guidance, training opportunities, resources, critical deadlines, program support, and more.

Privacy Statement: When you register for a mailing list, we won't share your email address with anyone outside HUD. For more information, read the HUD Exchange [Website and Privacy Policies](#).

Sign Up Now!

Subscribe to Email Updates

Update your preferences

Unsubscribe

Subscribe to Email Updates

Email Address *

Zip Code

I'd like to receive email updates about:

☐ 811 Capital Advance

☐ Lead Safe Housing and Healthy Homes



Update Your Preferences

☐ IDIS - Integrated Disbursement and Information System

☒ Lead Safe Housing and Healthy Homes

☐ Multifamily Housing Preservation

Upcoming Trainings – November/December 2022

Elevated Blood Lead Level (EBLL) LSHR Amendment Training

Audience	Webinar	Office Hour
TBRA	Tuesday, November 15 1:00 – 3:00 PM ET	Thursday, November 17 1:00 – 2:00 PM ET
Public Housing and PHA	Tuesday, December 6 2:00 – 4:00 PM ET	Wednesday, December 7 2:00 – 3:00 PM ET

Register through the HUD Exchange. Registration email sent through Lead Safe Housing and Healthy Homes Mailing List.



Resources

- Lead Regulations: http://portal.hud.gov/hudportal/HUD?src=/program_offices/healthy_homes/enforcement/regulations
- Lead Safe Housing Rule (LSHR) Training: <https://www.hudexchange.info/trainings/lead-safe-housing-rule/>
- EPA page: <https://www.epa.gov/lead>
- Interpretive Guidance on LSHR: <https://portalapps.hud.gov/CORVID/HUDBLPAdvisor/info/documents/LSHRGuidance21June04.htm>
- Lead-Based Paint: <https://www.hudexchange.info/programs/lead-based-paint/>
- Lead Safe Housing Rule Toolkit: <https://www.hudexchange.info/programs/lead-based-paint/lshr-toolkit/introduction/>
- Evaluating LBP in HUD-Assisted Housing Videos: <https://www.hudexchange.info/programs/lead-based-paint/evaluating-lead-based-paint-in-hud-assisted-housing-videos>
- PIH Notice 2017-13: https://www.hud.gov/sites/documents/17-13PIHN_OHHLHC.PDF

Contact OLHCHH: leadregulations@hud.gov



The background features a stylized graphic in a lighter shade of green. It includes a house with a gabled roof and three rectangular windows, and a large, thick-lined sun with curved rays positioned behind the house.

Q&A

Disclaimer

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