

Lead Safe Housing Rule Webinar Series, Subparts J & K

**Spring Session 1: Rehabilitation, Acquisition, Leasing, Support
Services, or Operation**

Wednesday, May 19, 2021

Les Warner: Great. Thank you, Paul. So welcome everybody. This is our first session of the lead-based paint regulation training and this is specifically on Subpart J and K. The full title for the regulations is the lead-based paint poisoning prevention in certain residential structures. But we're going to be focusing in this specific training first on -- we're going to spend our first session and we'll go through the agenda in some detail, but we're going to be going through some basics that will apply for everyone.

And then we will sort of split out a topic to specifically talk about Subpart J which applies anytime you're doing rehabilitation. And then our second part will be on Subpart K which is where the requirements are covered for when you are using -- utilizing money for acquisition, leasing, support services and operations. As we go through this, we will try to always make sure that we are calling out the acronyms that we're using and there quite a few of them as we go along.

Just a couple of these I'll just mention but we'll call these out as we get a little further into things. You might see an abbreviation of LDR and that's the Lead Disclosure Rule that we're going to be talking about. You'll also see references to LSHR and that's the Lead Safe Housing Rule and we'll -- as we go along, we'll sort of build your knowledge of acronyms as we work our way through this. So first I wanted to start with just a few introductions. You're going to be working with us hopefully for up to four sessions, so we want you to know who folks are, Kris is going to be my colleague on this. Kris, do you want to do a quick introduction?

Kris Richmond: Sure. Let me see if I can try to turn my camera on too. Hi everybody. I'm Kris Richmond I'm with ICF, I have been doing trainings with Les for many, many years and expert in lead-safe housing rules as well as the home program. So glad that you're all here today with us, thanks.

Les Warner: Great. Thank you, Kris. And I'm Les Warner also with ICF. And prior -- I've been with ICF for about 14 years prior to that, I worked at the state level for 20 years. So I've worked on implementing some of the programs and dealing with some of the issues that we're going to be talking about. Kris and I are really lucky to be joined by Bruce Haber, Karen Griego, and Jerry Freese. They're from the office of lead house or control and healthy homes. And they're going to be helping with us on answering questions as we go through this series.

So you've got a lot of expertise teaming up on this. And so let's jump in and talk about what the series is going to cover. So we'll start with a quick overview of the series itself. So the first thing we're going to be talking about is, why do we care about this? What's the significance of having elevated blood lead levels? And so why should we not be concerned about that? We'll then be going through the federal lead-based paint regulations.

And as we work our way through going through the separate subparts, Subpart J and K, which gives specific information for particular activities that you would be undertaking and giving the detailed requirements for those activities. So as part of this training, then we'll be talking about the process, the planning that needs to be in place, the documentation that will need to be put in place as you implement each of your projects.

We'll also be making sure that you're familiar with key terms along the way, and we'll also be pointing out. There are lots of really good resources available to you. We'll have a whole number of handouts as part of this training, but also there are some online resources that we think will be very useful for you.

As Paul mentioned there is a Q&A box that you can ask questions and we encourage you to do that. I will note that I think for folks, particularly as if you were newer to this and just trying to grasp what the regulations are and how they apply to the work you're doing, I might suggest to you that you really focus on the presentation itself and not try to track both the Q&A questions that are coming up and responses, because I think it can be a little distracting for folks that are just new to the subject matter.

So that's just a suggestion on that. All right. So let's talk a little bit more about how this will play out. So we're going to have four weekly sessions. These are booked for up to two hours, a few of these might be slightly shorter, but we have a lot of material to be able to cover. Each one of our sessions then we'll have the following day a one-hour office hour session. And so in some cases you're going to have homework that we will ask you to do. So those exercises are kind of testing the key concepts that we were covering in that prior day's session.

But that also gives us a chance to answer questions so particularly for folks that are newer and trying to focus on the session itself during the Wednesday session, that Thursday office hour gives you another opportunity to watch and listen questions, and also ask those questions once you've tried to absorb the material itself.

So the recommendation or requirement is that everyone participates in session one because we're going to be covering material that really applies to all of the activities that you might be undertaking. And so everyone would participate in Session 1 and then Session 2 and 3 are focusing on Subpart J, so any activity that involves rehabilitation is going to be covered under Subpart J, so any of you that are operating programs are working on projects that include rehabilitation should be attending Session 1 through 3.

Session 4 is going to be focusing on leasing operations, supportive services and also acquisition without rehab, and so for folks that were working only in those areas, then we would suggest that you attend Session 1 today's session and then Session 4. I would think that many of you through the scope of what your organization is doing it may make sense for you to attend all sessions.

And frankly, if you think that in the future, you might be involved in projects that involve the rehabilitation it will be a really good recommendation to participate in all of those trainings, so that you have laid some groundwork of knowledge about what would be triggered if you were doing relocation.

You will be receiving a link which will provide access to recordings for these sessions, so we understand that you might want to go back and relisten to sessions or in the case where something changed with your schedule and you weren't able to participate in the live sessions that this would give you another opportunity to be able to revisit that material. All right. So

here's the overview of the agenda today. We're going to be going through the lead-safe housing rule basics, and we're going to be talking about the separate sections of the regulations and those sub-parts that are going to apply for everyone.

Then in Session 2 and Session 3, we're going to be, as I mentioned, diving into Subpart J which applies when rehabilitation as part of that project, so we're going to be kind of breaking this up a little bit, looking at some of the requirements and putting together a rehabilitation program, some of the staffing certification planning needs that need to be addressed as part of that. And then session 3, we'll focus a little bit more on the implementation. So what's going to happen during construction, what's happening at the completion of a project as we are seeking to meet our clearance standards on that.

So we'll go through the details of how this -- the overall lead-safe housing rule and Subpart J will impact operating a rehabilitation program. And then in session 4, as I mentioned we're going to be focusing on Subpart K for acquisition, leasing, support services and operation programs. So I just mentioned here, if you have home buyer assistance that does not include rehabilitation then session 4 is going to be appropriate along with session 1. But if you have rehabilitation as part of home buyer, then Subpart J will apply and so you do need to participate in session 2, session 3 as part of that.

All right. So we want to learn, we'd love to be able to go through introductions for everybody, we can't really do that with the numbers that we have on the line. So Paul's going to open up our poll. Looks like it's open now, and what we'd like you to do is go in and vote or indicate your level of experience.

So either you're new to the lead regulations, you have some experience or you know how to be able to perform all the key steps. If you'll go ahead and indicate which one of those applies most appropriately for you and hit the submit button that'll give us some cumulative results in a moment here and give Kris and I a feel for the participants and how to be most helpful as trainers.

Paul: The poll's closing, make sure that once you selected your answer, you hit that submit button, so that way your answer is recorded.

Les Warner: And we have results. All right. So we've got a pretty good mix here. We have some folks that have quite a bit of experience but we've got kind of a mix between folks that are new and just learning the regulations, and some folks sort of in that middle area that have some experience.

I think that with the details that we're going to be providing in the training that should help folks that are new to establish a base knowledge and help answer some of the questions for folks that have a little higher level of experience. And for everybody as part of this, I think this will serve as a refresher and also give you access to some resources that would be important for you.

All right. So our second polling question then is the types of programs that you're currently operating. And so our choices are rehabilitation, homebuyer acquisition that does not include

rehabilitation, c) leasing and support services. And then I would assume many of you are going to have two or more of those programs. Polls are open. If you can go ahead and vote, please.

Paul: We'll be closing the polls soon, again make sure you hit that submit button once you've selected your answer.

Les Warner: All right. So the majority of you doing just one activity or doing rehabilitation, we have some folks running that adjust to homebuyer acquisition program, a small group doing leasing and support services, but a lot of you, as I would guess have two or more types of activities going on.

So folks that are doing two or more activities and anybody who's doing the rehabilitation need to do sessions 1, 2, and 3, and then folks that are doing homebuyer acquisition, which does not include rehabilitation or the leasing and supportive services would do session 1 and session 4 as part of that.

So this slide is just a reiteration on that. When in doubt, I would suggest that you attend all of these. I'll just note that if you have projects that include acquisition and rehabilitation work over \$5,000 per unit then you need to make sure that you're attending all sessions as part of that. And we had some confusion in the prior delivery of this and folks trying to figure out which of these sessions should I attend.

All right. So let's launch into talking about the lead-safe housing rule basics, and really first start by talking about why are we caring about lead? Why is that something that we have a rule in place about? So lead is a naturally occurring element. We tend to think something's natural, that it must be good for us but lead much like arsenic and some other things are not something that we want to have higher levels of exposure to.

And so we have a number of ways that we have exposure through manufactured products. And those include or included things such as paint, we had lead-based fuel being used until more recent years, but also because of that, then we have some contamination in soil. We know potentially about water contamination with piping and other sources on that.

And then we'll be talking a little bit about some sources such as industrial or, products that would be in your home like ceramics, batteries, some cultural items even things such as home remedies that folks were using that might include lead. And so when there are particularly children in households that we find that have an elevated blood lead level, part of that challenge is to try to make sure what's the source of the lead and what can we do about this.

Particularly in this session, we're going to be focusing on as we are funding housing activities what we can do to make sure that we protect those occupants from that exposure and the impacts from that exposure.

So who's really at the highest risk? So number 1 is children under the age of six. So their bodies are growing. They have kind of the most exposure. We're going to be talking a little bit about

things like, hand to mouth actions, lead dust in particular is kind of heavy and we have children that are crawling.

And so their contact and possibility of ingestion with lead hazards is a little bit higher than adults. And so they are particularly at risk of impact from that. Also pregnant women. And so a pregnant woman with an elevated blood lead level is exposing that child that is still developing to those hazards.

And then part of our focus in this training is going to be thinking about when we are doing construction work, are we creating hazards? Are we exposing workers to those hazards? So we've got workers in construction in some industrial fields that because of the nature of their work have a higher level of exposure, and they might be bringing that home to their family essentially. And so we'll be talking a little bit about that.

So with children and the exposure to lead the impact on this as they are perhaps putting hand to mouth action or putting objects in their mouth that have lead dust on that, they could be chewing on painted surfaces and ingesting chips of the paint. But the impact for that child can then be on things like decreasing the development of their body. So bone and muscle growth, having impacts or damages to their nervous system.

It can impact their brain development and their -- essentially their IQ as part of that, along with things like hearing loss, learning disabilities then damage to organs such as the kidneys, and then you'll see noted also anemia. So all really serious impacts for children, something that we want to try to avoid. So that level of triggering for exposure is at 9 micrograms of lead per deciliter of blood. So that currently is our testing level for a child that has an elevated blood lead level. And so I hope --

Kris Richmond: Les, I just want to - I just want to interject, I think it says 5 on the slide. People are starting to question nine versus five.

Les Warner: Oh, I'm sorry. Did I say nine?

Kris Richmond: Yeah. That's okay, that's okay.

Les Warner: That's the intended, well, I'm glad you are paying attention. Thank you. All right. So the lead-safe housing rule was put in place to try to protect children. And it really covers any time we are dealing with housing that was constructed prior to 1978. So in 1978 we had rules put in place that eliminated the sale or use generally of lead based paint. So our target here is housing that was constructed prior to that.

And we're going to be talking in a few minutes about some of the few exceptions that relate to that, but just keep in mind that the lead-safe housing rule generally other than these exceptions applies without exception to who is actually living there. So the fact that we don't have any children that are under age six, that are occupying a structure, if we're doing rehabilitation, the Lead Safe Housing Rule, Subpart J is going to apply. If we're doing acquisition leasing, supportive services we're going to be following Subpart. K.

So the fact that we don't have a child under six is not making the rule go away for us. We're going to talk about a couple of exceptions in a moment, but overall for the Lead Safe Housing Rule it applies with the trigger of the federal dollars. And we'll be going through, Kris is going to be in the second section here talking specifically about the triggers for the lead-safe housing rules and what programs, what funding use the supplies for.

So there are some exceptions on this. If we have a property that was constructed after January 1st of 1978 then we can presume that it does not include lead-based paint, because lead-based paint had been banned at that point. Also where we have zero-bedroom units or SRO, which stands for Single Room Occupancy that does not -- the lead-safe housing rule does not at this point apply. Now that exception goes away if we -- so the reason there's an exception for zero-bedroom and single room occupancy is there's a presumption that there will not be any children occupying those units.

If that housing does include a child under the age of six, then that exception will not be valid and you will have to follow the lead-safe housing rule requirements. Also housing that's designated exclusively for elderly or disabled, and where we oftentimes see confusion on this is, we have a local program that's running a housing rehabilitation program, and they would say, Well, you know, there's two occupants of this house. They're both elderly, so I don't have to follow the lead-safe housing rules. That's not correct.

It's only when we're dealing with housing that has been specifically set aside for the exclusive use of elderly or the disabled. So a general homeowner unit that happens to be occupied by elderly or disabled individuals is not falling under that exception. It's only this designated housing.

And even in that case, if an elderly or disabled housing, we have a child that's less than six that's residing in that unit or expected to reside there. So when we talk about expected to reside there, we mean that a lease has been signed and they are going to be moving in to that unit, or we could have a pregnant woman. And so we're expecting that there's going to be a child under six, that's going to be joining that household.

Our last exception here is when we -- we could have a pre-1978 unit that had been inspected and it was determined that there was no lead-based paint in that unit or where we have documentation that all lead hazards have been removed from that property and that they have acceptable clearance testing that has been done for that unit.

So in the absence of the documentation to meet one of these requirements, you would need to be following, implementing the lead-safe housing rule and the appropriate subpart that would apply for the type of activity that you were undertaking. In some cases, we might have an unoccupied property that you are going to be working with to demolish and you're going to keep it unoccupied so you would not need to follow the lead-safe housing rule because we're not going to have any occupants that we're protecting.

And you may be some cases where you're doing -- taking some kind of emergency action. So maybe you have a structure that has been damaged in some kind of natural disaster, maybe you have some kind of structural issue has happened that needs to be addressed to keep the building from collapsing.

That emergency action itself could be done outside of the lead-safe housing rule, but when you then go to do the rest of that job, so the rehabilitation of that property that will need to follow the lead-safe housing rule, it's just that emergency action that would be exempt from those regulations.

And then I'll just point out, and this is for right now this is particularly important, Subpart K, which we'll be talking about in much more depth in our fourth installment on this, includes where we have leasing assistance. And so right now, because particularly of COVID, we have a lot of funding being providing emergency, rental assistance and foreclosure prevention assistance. So Subpart K does not apply as far as the testing requirements.

If we have assistance that is 100 days or less, and we've received recently guidance about how that calculation of the 100 days is done. So it's based on -- it's triggered by that initial payment, rather than, so let's say I have a household that is three months in arrears for their rent and so I'm going to pay three months of assistance and I'm going to approve them for three additional months.

So our clock in calculating that 100 days starts at the point that I make that initial payment, which would cover that three months of rent they were in arrearage for. So 100 days starts at that initial payment and moves forward. So we actually could be providing a longer period of time than just three months of assistance, because we're calculating based on that payment date, as opposed to the period of time that that rent was accrued.

So that's a very important clarification. There was guidance that was put out as part of the CDBGCV frequently asked questions. And so for those of you using rental assistance to try to address COVID-19, that would be an important point of a window for an exception on that. So we also have sometimes when based on the work that's being done, we might be exempt from that requirement. So in cases where we have -- our work is not actually going to disturb the painted surface, and we have to be kind of careful about how that -- this is actually being used.

But so for instance if I was doing some kind of emergency repair maybe where I was replacing the HVAC systems, so I'm replacing furnace connecting it to existing duct work, I might not have any impact on a painted surface. We sometimes have folks saying, Well, you know, I'm just putting on a roof.

Well, then we're going to have impact oftentimes on the facia and other painted surfaces. So we really have to look at the work that's being done and whether we truly are not disturbing any painted surfaces as part of that.

The lead-safe housing rule also includes some de minimis levels, which if we meet that criteria for the de minimis levels then we are only required to do -- to do safe work practices while we're

doing that. So for 2 square feet of interior space or also for 10 percent of a small component type. And that's really when we think about component types like maybe woodwork, where it's really not laid out in a way, it would be easy to measure based on a 2 square foot requirement. We will be looking then at a percentage of that component type.

When we're talking about the exterior, we could then fall under the 20 square foot of exterior work. It's important to note here, and we will be talking later in this training about also the EPAs renovation remodel requirements, the RRP guidelines, that the EPA guidelines also include de minimis levels and they are different than the HUD de minimis level.

So when we're working on a project and we're trying to operate with within the de minimis levels, we need to make sure that our staff, our program, and also our contractors understand that if this is a HUD funded project, then the HUD de minimis levels are going to be what are going to apply for this. We're always going to look some more stringent of those requirements. So at this point I'm going to turn things over to Kris. Kris, is there anything that we want to call out before we switch trainers here?

Kris Richmond: Somebody was just asking about the interior space. So if you want to go back a slide.

Les Warner: Yeah.

Kris Richmond: In regards to the 2 square feet per interior space, they were just looking for some clarification on that.

Les Warner: So for instance, let's say I'll use the example of I don't know, we're switching out some electrical outlets. And so our workspace, we could measure it out on the wall where we are going to be disturbing a painted work surface.

If that is less than two square feet the we can say, okay, so we are not triggering this, we are not required to do lead-safe work practices. I would suggest you follow lead-safe work practices. But it's really looking at that particular work area and doing a measurement to make that determination.

Kris Richmond: Great. there's some other questions that I think we can probably answer those later on when we get to the end of today's session. Thanks Les. See if I can turn my camera on, it wasn't turned on before. Looks like it's on now. All right. I'm going to get started. All right. So we, today and the next couple of weeks, we are going to be talking about two different federal regulations.

We're going to be looking at HUD's, lead-safe housing rule, which is founded 24 CFR part 35, and then we're also going to be talking about EPA's rule and this is found at 40 CFR part 745. So if you're new to the regulation, CFR stands for the code of federal regulations and all of HUD's regulations are found at title 24 and EPA's regulations are found at title 40. So that's why you'll see those numbers at the front of each of those.

There's a number of different requirements that we're going to go through. First, just to show you Subpart A, the lead disclosure rule, this is identical to EPA's disclosure rule. That's why we had the two yellow arrows there together. They're actually word for word identical.

And then under HUD's rule, we have our Subpart B, this is where our general lead-safe housing rule requirements and definitions are provided. Then we have our actual sub-parts. So we have Subpart H that's our project-based assistance. We have Subpart J, which is for rehab. We have Subpart K, which is for acquisition, we think supportive services and operations.

Those are the two main ones that we're going to be focusing on during our webinars. We have Subpart L, which is for public housing, and we have Subpart M, which is for tenant based rental assistance. So each of those different sub-parts are also identified within the regulations. And then we have Subpart R which is our lead-safe housing rule methods and standards.

And you'll see, we have a little connection here to some of these and EPA as well. So Subpart R in HUD's regulations are the what, what are the evaluation requirements? What are the lead hazard reduction requirements that need to be carried out? And then for EPA's rule here, Subparts D, L and Q, this is the who, what are the standards?

What are the certifications for the abatement supervisor or the workers or the risk assessors are the inspectors? So HUD is telling you what needs to happen and the EPA rule is telling you, who can do that kind of work, what kind of certifications do they need to have? And then this last rule over here under HUD's rule is Subpart E and Q. This is the renovation repair and painting rule. You'll hear Les and I refer that as the RRP rule and the RRP rule, minimizes exposure to dust and safe work practices.

So we just want to tell you about all these different requirements, we'll be going through these and referring back to them through the next several weeks. And then we do want to alert you that there were some changes about a year and a half ago where EPA lowered the dust standards for certain areas on the windows, on the floors. We're going to be talking about those when we get into module 2.

All right. As I mentioned there are different sections of the regulation, Subpart A, we'll be talking about disclosure. We're going to be referring to B, the general definitions. We're not going to be going over these other ones here.

If you work with project based assistance or you work in a tenant based rental assistance or public housing, we did do some training in the summer of 2019 for the amendment, which is the elevated blood lead level amendment. And so those are listed on the HUD exchange. When you go to the lead-safe housing rule page you can find those trainings and so you can get up to speed on that.

But our focus really on the next couple weeks is on J, which is rehabilitation and K, which is acquisition, leasing, supportive services, and operations. You might also hear Les than I referred to Subpart K is also because if you take the first parts of each of these areas, we come up with

also. Great, so this is a list it's not an exhaustive list, but it's a pretty good list of the HUD programs that triggers Subpart J, which is rehab of lead-safe housing rule.

You see, we have community development block grant, we have the HOME program, or housing trust fund program. We've HOP on here, emergency solutions grant, continuum of care, the SHOP program. So if you are doing any kind of rehab with these different programs then Subpart J is triggered. And then we have our Subpart K, again not an exhaustive list, but it does show the HUD program that triggers Subpart K for acquisition, leasing support services and operations. You'll see there's a lot of overlap from K -- from J as well.

We have our community development block grant; we have our HOME program. Again, we have our housing trust fund program or continuum of care, emergency solutions grant, our HOP, our SHOP program. So you can see that there's a lot of overlap where if you're working in these programs, K will apply for doing acquisition, lease and supportive services, or if you're doing rehab, then J applies. So while identifying the program is important, it's really critical for you to keep in mind what you are using the funding for, what kind of activity are you undertaking? Are you undertaking rehab?

If that's the case, you need to follow Subpart J, if you're undertaking any kind of acquisition or leasing or support services, or operations, then you need to be following Subpart K. So in the previous slide we saw regulations and this slide give a little more overview about what each one is. So the first one, the disclosure rule, this was founded Subpart A for the HUD rule and the EPA Subpart F as in Frank, it's for both assisted and non-assisted pre-78 housing.

All right, we're going to -- we have a couple of slides that'll go into what the disclosure rule is. And then we have the lead-safe housing rule. The lead-safe housing rule applies to almost all federally assisted and federally owned housing built before 1978. We also have this amendment here the elevated blood lead level amendment that was put into effect in 2017.

The blood -- the EBLL is not implemented in Subparts J and K, but we're not going to go through what the EBL requirements are because they are triggered for Subparts L public housing Subpart H project based assistance and Subpart M tenant based rental assistance.

We have a summary chart and you'll see on that summary chart line, there's a no next to whether EBLL requirements are triggered or not. So we do not need to follow the EBLL requirements for Subpart J or Subpart K. And then we have EPA's renovation and repair rule. This is the RRP rule, it applies to almost all target housing, public and private that's built before 1978. So this is for any housing or childcare or preschools that were built before 1978.

So anytime there's any type of renovation or repair or painting that's done by a contractor that's just serving paint, then they need to be following the RRP rule. So you'll see we're layering these different rules, all on top of each other, because we need to follow -- we need to be following all of these requirements.

Okay. We do have a couple of definitions and we have a lot of handouts. And if I look at the top of my screen here, they all say lead-safe housing rules. Let's see if I can find the right handout.

Yep. Here we go. Right. So there are five or six different handouts, there was a link that was emailed to you that gave you the directions on how to get in today. And if you look on that email, it has a link to all of the different handouts.

So if you didn't get a chance to download those handouts, or if you're old school like me you need to print everything out, if you didn't get to print them out, go back to that email and you'll be able to access the different handouts. And I really suggest if you're new, if you're one of those one third of the people that said I'm really new to lead-safe housing rule, please look at the handout before the rest of the sessions. I think it'll really give you a good grounding on what some of these things are.

So when I move down, I'm taking this gray scroll bar, and I'm actually moving the page down, so you need to do that yourself. You're able to move to the other pages with me, but when I scroll down the page, you need to move your scroll bar down to be able to see the bottom of the page. And so you'll see that lead-based paint is listed here close to the bottom on page 1 of our definitions. And so lead-based paint is paint or other surface coatings that contain lead equal to, or exceeding 1 milligram per square centimeter.

And then we have another key definition we're going to talk about is target housing and target housing is any housing that's built before 1978 with some exceptions. And those exceptions would be housing exclusively for the disabled or housing exclusively for elderly or zero-bedroom units.

And like Les said those are even not considered exceptions if they have children under six living in them. So most of the housing that we're dealing with today is target housing. So it's any housing built before 1978. And then we have our lead-based paint hazards and our lead-based paint hazards are any conditions that cause exposure to lead from deteriorated lead-based paint or from dust with lead levels at or above the dust lead hazard standard, or from soil with lead levels at or above the soil of that [inaudible], or perhaps we have friction impact or chewable surfaces.

So friction surfaces, we're opening and closing windows, and we're creating dust or impact of walking across floors and that's causing dust chewable surfaces. There might be a surface that a child is pulling themselves up to and they are mouthing onto the window sill. And we see the chew marks on that. That's a chewable surface.

So any hazard that's created from friction impact or chewable surfaces with lead-based paint or associated dust lead hazard is considered lead-based paint hazard. The last time we trained this, we had a lot of questions about, well, we did a risk assessment and there's lead paint, but it's fully intact. We don't see any dust. We don't see any peelings, chipping, flaking, scaling paint.

Well, that's not a hazard. So lead paint itself is not necessarily dangerous if it's intact, if it's maintained, but if we see it deteriorated or it's just, there's a lot of dust that's being created, or if it's in the soil, those are the items that we need to be addressing, because now it's considered a hazard.

There's also -- I talked a little earlier about the standard for what was considered lead-based paints, a 1 milligram per square centimeter. There are some states and communities that have more stringent definition of what lead-based paint. They might have a more protective standard of what's considered lead-based paint, HUD sets this limit as a 1 microgram per centimeter, but you may be working or living in a city that has a more stringent requirement. So you want to check with your state and local regulatory authorities to determine whether they're stricter requirements or a stricter definition of lead-based paint in the area that you're working in.

Right. So this slide is going to show just a real general overview of the steps. And we're going to go into details of each of these as we go through the different modules, but just to give you an overarching overview, the first is disclosure and disclosure is done when we are working with, for sale housing or for leasing housing. So that's when we would be providing disclosure. So the owner needs to disclose if there's any known lead-based paint or lead-based paint hazard, they also need to be disclosing any reports. They're going to give out the pamphlet that protects your family from lead in your pamphlets.

And then in this module, we have a couple of slides that are going to go through about what disclosure is, but also no knowledge or not knowing if there's the presence of lead, that also needs to be disclosed. You're either disclosing whether you know if there's lead in the home or not and if that's the case, any reports that support that, or if you don't know if there's any lead in the unit, that's also part of the disclosure process, but again, that's for sale or for leasing.

And then the next step we have is look. And so we're looking, or you might hear us use the term evaluate, this is what the term we use for lead-based paint. We're looking for lead-based paint or lead-based paint hazards. And then once the hazards that are identified, they have to be reduced or treated, and the different ways that these are going to be treated we're going to discuss during the different modules, that they're standard treatments, there's interim controls, there's hazard abatement, there's repair.

There's a number of different treatments, and when we get into the different modules we'll discuss, what is the appropriate treatment? What are the standards that the people do in the treatment or certifications, what do they have to have in order to do that? And then after the work we need to do clearance. So after the work is done, the unit has to pass clearance. This is done by a combination of both a visual and dust sampling, and there are requirements for who can do clearance as well.

And then we have notification, we have to tell, so owners and residents must be notified in writing when the lead hazards are found and also a separate notification of how the lead hazards were treated and cleared. There are certain requirements and elements, and there's also timing that's tied to a notification and we're to discuss what those are when we get into the upcoming modules.

So how do you use several approaches and structuring the requirements for the regulations? So they tried to base it upon what level of intervention or what type of funding or how much funding is going to be put into the different types of projects that are going to be done. And the

approaches go from least restrictive to most restrictive, or least protective to most protective. So we have the first approach do no harm.

This is -- it's allowing a low cost repairs to proceed without costly requirements. And it prevents from creating additional lead hazards. It does not address the whole condition of the unit or the whole property it's really just focusing on one certain area of work that's being done. We will see the approach 1, do no harm when we're in the up to and less than \$5,000.

I should show you this chart here. So this is another handout that you have, and you'll see that we have Subpart J requirements over here. And we have sub part K on the far right side and the do no harm that -- first one is right here, the up to including \$5,000. And we're going to talk about in module 2, how do we figure out what this dollar amount is? Okay, so we're not going to say if you're just giving them \$5,000, that's what you do. There's a calculation that we have to go through to determine which level of assistance you fall in. But approach one is up to, and including \$5,000.

And then approach 2 is identify and stabilize deteriorated paint. So lead-based paint is stabilized, but it does not prevent the reappearance of deteriorated paint. And we do have ongoing maintenance requirements. So we do have ongoing maintenance requirements for all of these approaches, if there is an ongoing relationship. So for approach two, we see that, let me back to my chart here, approach two, identify and stabilize deteriorated paint is what we are going to find here in Subpart K.

So if you're working in acquisition, leasing, support services and operations you will be following approach to identifying and stabilize deteriorated paint. You can also see the numbers listed here, so that will help you as well. All right, so approach three, identify and control lead-based paint hazard.

Approach three is providing assurances that the lead-based paint hazards are eliminated. We do have ongoing maintenance requirements because interim controls are not permanent. And when we go to our chart, we see approach three is in this middle category here, over \$5,000 to \$25,000, that's what we're going to be identifying and controlling lead hazards.

And then we have our most stringent our most protective approach, approach 4, identify and abate lead-based paint hazard. So this is used for substantial investment in the property. The long-term hazard control methods such as abatement are used to ensure the unit of remains lead safe. And there are, like I said, for all of these approaches ongoing maintenance requirements.

And so we have you'll see approach four, it's for over \$25,000 for rehab, okay? So the dollar amounts are only for rehab when you're in acquisition supportive services or operations, we don't care how much money it is, we just follow the Subpart K requirements. It's only when we're in rehab that we're trying to delineate, which of these categories are we falling into. And that's when we try to figure out what our level of assistance is.

All right. And here's the chart as well. You have this as a handout, so you can look at your handout or you can follow along with our slides here. So again, I'm not going to go into each

detail of these categories because we're going to do that when we get into Subpart J next week and the week after, but just so you can see, we did go over the approaches.

We went over the notification that's our telling, telling people what we need to do, looking is the lead hazard evaluation, so we'll be doing paint testing, I'll do a paint testing and a risk assessment. We're going to talk about what those all are later on.

We have, what kind of treatment are we doing? What is the lead hazard reduction that needs to be done? What kind of ongoing maintenance requirements do we have? You can see here, there's ongoing maintenance requirements for rehab for home rental only, and then elevated blood lead level requirements, the EBLL, we do not have elevated blood lead level requirements for Subpart J, okay? So that's not something you need to be concerned about. And then we have different options. So pretend you did not want to do paint testing then you could presume that there's lead-based paint.

You would also then do different treatments if you were presuming, so we have lots of options here, we're going to talk about these different -- each of these different categories and what all these means for Subpart J when we get together next week and the week after, and then we will discuss all of these as well for Subpart K the last week we're there together.

So again, for Subpart K, you see, we have our approaches and we're following approach two for both acquisition, we think support service and operations. The only difference that you'll see between these two columns here is the ongoing maintenance. So is there ongoing maintenance? There is no -- there is no ongoing maintenance if there's no ongoing relationship. So let's pretend you used your home money for down payment assistance. You don't have an ongoing relationship.

So you do not have ongoing maintenance requirements. If you have an ongoing relationship, which is always the case for leasing, support services and operations, then we do have ongoing maintenance requirements. And we have slides that are going to talk about what these ongoing maintenance requirements are, so don't panic we're going to go into great detail about what those are as well.

All right. Let's do a knowledge check. Now, if you were paying attention to Les, this one's probably going to be pretty simple. Because he did use an example similar to this when he was explaining things. So this is going to show up as a poll. So the scenario is Mr. And Mrs. Jones live in the Franklin Farm neighborhood. It's a single family subdivision.

So just a regular neighborhood and the Jones are in their mid-70s. They want to have their 1940s home rehabilitated through the city's HOME program. So true or false. Mr. and Mrs. Jones are exempt from the lead-safe housing rule because they're elderly. So take a look at this and let me know if you think it's true or false, and then after you click true or false, please push the submit button. So Paul has everyone had a chance to put their answer in yet? Perfect. All right. I see the poll is closed. Thanks, Paul. All right.

So most of you overwhelmingly got the correct answer. The correct answer is false, right? They are not exempt from lead-safe housing rule because they are elderly. Remember that exemption is only if they live in housing, that's exclusively for the elderly. The Jones live in Franklin Farm, which is actually the name of my neighborhood. I live in Virginia and it's a regular -- there actually are multifamily there as well, but it's just a plain old subdivision. So it's not exclusively for the elderly. So the lead-safe housing rule does apply.

And one of the reasons for this is that the Joneses we want to make sure that we're rehabilitating their home to be lead-safe because they could sell it and maybe a family, you know, that has small children is moving in. So we never know who the next household is going to be and so that's why Subpart J and Subpart K are not triggered based upon the presence of the child. You saw there were no children living in Mr. and Mrs. Jones house, but their house is still subject to lead-safe housing rule because it's pre-1978. And they are using federal money that's triggering Subpart J.

All right. So I talked about disclosure. I mentioned that on the chart. So let's talk a little more about what do we mean by disclosure? Well, disclosure applies when you're either selling or renting or leasing a unit, and the lead disclosure rule does not apply to rehab. It does apply, so it's not going to apply to Subpart J but it does apply to Subpart K, and property owners are required to disclose the knowledge of all known lead-based paint when the owner sells or rents the units.

So we're going to provide you with a really brief overview of disclosure and what you need to comply with disclosure for the lead-safe housing rule. So disclosure has been in place since 1996. So this should not be new to anybody that's -- those pamphlets should look really familiar to you. You are able to access this pamphlet from the HUD website, from the EPA website it's in multiple languages, but the reason we do disclosure is to provide information about lead-based paint and lead-based paint hazard.

And so the owner is disclosing any known lead-based paint or lead-based paint hazards in the unit or common areas servicing the unit. The owner also has to disclose if they have no knowledge of lead records or reports. So it's going to apply to almost all pre-'78 for sale or rental units.

So that's going to fall within our Subpart K. Like we said, they're going to hand out the owner. I mean so they're going to hand out the pamphlet, it's going to provide a warning statement and they are providing any reports or records that are going to help support whether they know if there's any lead-based paint or lead-based paint hazards.

This does need to be done before the contract is signed. So if a tenant is renewing a lease and the owner has new information about lead-based paint or lead-based paint hazards, the owner does need to provide a new disclosure notice to that tenant. So that's only required if there are new updates or new information about any lead-based paint or lead-based paint hazards. We also have a disclosure handout, see if I can find it. Okay, so we have a disclosure handout. Again, this is one of the links that was provided to this.

We'll just go into a little more detail about the background of the disclosure rule, if this is new to you and you're not really sure how it relates or how you implement that. So we have a nice handout for that for you as well. But again, as I mentioned this is for, for sale and rental units it's not really applicable for rehab.

There are many times when disclosure is exempt it's exempt -- these exemptions are found at 24 CFR 35.82. So disclosure is exempt if the unit, or is in foreclosure, the state of target housing at foreclosure, we would not need to do a disclosure notice. If the unit was found to be lead-based paint free.

And this was found to be lead-based paint free by a certified inspector, who's under a federal certification program or the inspector who is federally accredited by a state program or a tribal certification program. So we can't just have anybody say it's lead-based paint-free it has to be done by a certified inspector.

We can also not have to do disclosure if we have a short term lease. So if we have a lease that's 100 days or less, where there is no renewal, or there's no extension that's going to occur, we would not need to do a disclosure notice. And then for rentals of existing leases, in which the leaser already disclosed all information and no conditions have changed. So if this is previously disclosed, we do not need to give another disclosure notice.

So this is a copy of the wrong disclosure notice, it's very common when HUD goes to monitor for them to see that the program is using the wrong disclosure notice. So this -- watch out for lead-based paint poisoning. This is not the correct notice; the correct form we have a copy on here. The correct form is the disclosure of information on lead-based paint and lead-based paint hazards.

So this can be found on the HUD's website. It can be found on EPA's website. There is a form for for-sale housing, and there's another form for rental housing. So depending on where they're doing rental or for sale, there's two separate forms. So you want to make sure you're using the correct form.

And if you are working in a state that's either Massachusetts, Rhode Island or DC, there are elements that have to be of a modified form that have to be used to be added to the disclosure notice. So if you're working on one of those three states, you want to check that out. The document has to be kept for at least three years, and it has to have signatures on file.

It's also subject to penalty violations for about \$18,000 per violation, and each form could have 10 possible violations. So this is something that you want to make sure you're doing correctly, because you could have up to \$180,000 a fine per form. So please make sure you're using the correct form at the very end of our module, I'm pretty sure we have a link to it otherwise you can go right to HUD's website or to the EPA website and you'll be able to download these correct forms to you.

Okay. Here are a couple sections that are often not completed correctly. You can see up here, this is where you identify if you know if there's lead, there's also an area to say where you don't know

if there's lead to one or the other is checked, we need to make sure that the timing is done correctly. So we want to be looking at the date.

So we need to ensure that the disclosure was given before the contract is signed, not after the contract is signed. So we want to be checking the dates. We want to be checking to make sure the signatures are true and correct. We want to make sure we don't have fraudulent signatures. Sometimes you have an owner that's signing for a venture. So we want to make sure that it's actually the renter that's signing.

And then if there were hazards that are disclosed, that there are actually reports that are being disclosed as well. So we would have some copies of reports that would follow along with that disclosure notice. And we want to be checking for all those things in your file. All right. So let's talk a little bit about documentation. So this is just a sample form, it's something that you could use for your files, you can use it to document and determine if the lead-safe housing rule applies to your project.

We do have a link to this form and if when you download the slides, you'll be able to access this link. Les and I in partnership with HUD are working on a toolkit. So we're close. So maybe in the next two months, we'll have this toolkit up and available on the HUD Exchange, and you'll be able to walk through your different sections to Subpart J and determine whether this applies to you or not, or Subpart K, depending on which sub party you're following to be able to use the flood screening workshop or the flood screening worksheet.

So something to look forward to, but we do have this particular worksheet available, and this is a good way for you to document because maybe the property was built after 1978 and it's exempt. And so when HUD comes to monitor and they don't see any lead documentation in the file, you can -- instead, you should have a screening sheet similar to this that says, Oh, we did check to see if the lead rule applies. And it was built in 1983.

And we know that properties built after 1978 are exempt. And so we've checked it and we've checked this box and they put it into our folder. So just a couple of different ways to document that you're actually screening for lead-safe housing rule. One of the keys to meeting compliance is having proper documentation. There's a lot more documentation for the Lead Safe Housing Rule than the EPA renovation return repainting rule.

You need to make sure you're keeping copies of all the certifications of the workers, of the supervisors, of the inspectors, risk assessors, whatever type of special personnel you're using. You need to have copies of their certifications, training that that's been done. You have to have copies of all your valuations, abatement reports, clearance, the list goes on and on, but the point is we need to keep copies of everything.

The lead-safe housing rule says you have to keep things for three years. Actual record keeping is probably keeping for the life of a project, because we always have to be disclosing any records that we have to new prospective buyers or tenants. All right. So we have lots of available resources. So let's review a couple that we have.

This is the lead rule compliance advisor. This is available on hud.gov. We have the link for you here. It's almost like a TurboTax where you -- it walks you through to determine which subpart applied to your project and what are some tips and tools that you can follow. It has simple forms; it has a glossary.

A lot of these forms are going to be put into the toolkit and they've been updated for rule changes that have been put in place. So the toolkit will have the most up-to-date, but until the toolkit is live, this is also another really great resource for you to access. And like I said, the link for this is on the bottom of the slide and you are -- you do have access to download the slides.

This is HUD's guidelines it's produced by HUD's Office of Lead Hazard Control and Healthy Homes. The 2012 is the most recent version. You are able to download this. I would not print it out if you been at home like I have for over a year now, and you're limited to your printing, this is an over a thousand-page document, so don't print it. You want to save it, and then you can go through and read the different chapters.

So this provides technical information about how to identify lead-based paint and related hazards and how to control the hazard safely and effectively. So really great resource. If you haven't looked at this yet highly recommend that you download it and at your leisure go through that and we're going to be talking about risk assessors and how to do a risk assessment and there's chapters in here about this, how to different types of treatments and there's different chapters about the different kinds of treatments, so really good resource to have.

This is also a brand, brand new, so we're really excited. We're trying to get together a listserv for lead-safe housing and healthy homes mailing list. Right now you all probably found out about this training because you're on the home listserv or you're on the CDBG list, or the continuum of care list serve.

So we are trying to also have a Lead Safe Housing and Healthy Homes mailing lists. So if you haven't signed up yet, we have the link here you can go to that, and it shows you on the screen, how to go in, how to sign up. You can click on the subscribe to email updates and you want to update your preference. And then when you get into updating your preference, you want to make sure you're checking lead-safe housing and healthy homes.

If you are not part of this mailing list, then you can still go to this link and you want to go to subscribe to email updates, and you can put your email in, and then you want to be checking lead-safe housing and healthy homes, because as more information becomes available the lead office is doing some amazing new products and tools and trainings. And so as it becomes available, you'll be the first to know about that if you get yourself on the listserv.

We also have links to some really great resources. Some that we've talked about already, some that we're going to talk about in the next couple of weeks, the OLHCHH is HUD's Office of Lead Hazard Control and Healthy Homes. This is their lead page; super easy to remember hud.gov/lead.

We also have our lead regulations landing page. This is on the healthy homes, on the HUD exchange site for you to be able to access. If you are looking for past trainings that have been done, there's links there, the compliance advisor, this is that TurboTax kind of thing I said for lead-safe housing rule, there's the link.

Interpretive guidance. There was interpretive guidance that was put out I think back in 2004, and it's in a question-answer format. So if you ask questions today HUD might have gone through and given you a quick answer, and might have said, interpretive guidance CJ4 or CK25, and that's referring to the interpretive guidance and the question number and J means we have K means acquisition leasing, supportive services, operations.

So again, if you're super new to lead, or even if you're an expert, this is a really great resource to go and look at. And right now, if we're just focusing on J and K, then just look at the J and K sections. And then as you have more time then go back and look at the other sections, as they're applicable to the type of work that you do.

This is the guidelines link. That's the one that I said that have different chapters on how to do treatment, how to do evaluations. If you are working with your CDBG-DR or your CDGB mitigation projects, there's some links there. And there's a really interesting video. It's a really simple way for you to understand the harmful effects of lead. It's so gross science video. We didn't have the capabilities play it for you today.

But if you aren't quite sure of what the hazards of lead are, and you have a couple minutes it's an interesting video to watch, and it makes it really simple, but it's very eye opening to be able to see how dangerous lead is not only to children, but to adults as well. And then if you ever have a problem, or if there's a question that's a little too complicated, because you've probably found already in the Q&A box, you're limited to the number of characters that you can actually type in.

If you have a really complex problem or question, always, always feel that you can contact your HUD staff at the office of hazard control and healthy homes. And their email is listed right here, leadregulations@hud.gov. So last question we should go over before we repeat what we're doing the next couple of weeks?

Les Warner: The only one that I was going to suggest that we mentioned. Bruce gave a really good answer. We had a question about documenting de minimus and his suggestion was taking a photograph with a ruler included in the photo so that you had documentation of showing that that met the criteria for being within the de minimus rule.

So particularly when we're talking about that two square foot de minimus rule, but that would provide you the kind of documentation that would be needed. I think most of the other questions, we probably will end up going into greater detail when we're in, particularly in the next two sessions on Subpart J. So I think a number of those will be answered in that way. I think that probably covers it.

Kris Richmond: So just to remind people what we're going to be doing, what we just finished today, Session 1. If you have friends or colleagues who didn't get a chance to watch today's

session, it will be posted, usually takes four days or so. So it should be posted before next week's session. But it will be available there.

Next week we are diving into rehab planning, and then the week after that, we go into rehab construction phase. Now Session 3 builds upon what we talk about in Session 2. Okay. So it is critical that you attend both sessions. If you miss Session 2, please try to watch the recording before you come to Session 3, because we're going to talk about how to determine the level of assistance. We're going to talk about what RRP is, and some really critical things that you're going to need to know as we dive into Session 3.

And then Session 4, we're going to be doing Subpart K acquisition, leasing, support services, operation programs. And we would love for you to come to all the sessions with us. If you have time and availability to do that. Just to repeat to everybody again, if you're doing rehab, you come to Sessions 2 and 3. If you are doing acquisition home-buyer assistance, leasing, support services and operations, you are attending Sessions 4.

If you are doing acquisition and rehab and your level of assistance is over \$5,000, then you need to be following Subpart J, so you need to come to Sessions 2, 3, and 4. And I like to show people that the way you can figure that out. So remember homebuyer, you're like, oh, I'm homebuyer. I'm Subpart K. Well, if you are providing more than \$5,000, then we need to look and you're doing acquisition and rehab, and we need to look at our approach and you see if you're providing more than \$5,000, our approach numbers are three or four and three and four is higher than two.

So that means if I'm doing acquisition and rehab more than \$5,000, I need to be following Subpart J, if you're doing acquisition and rehab, and it's less than \$5,000 you see this is approach number one. And in Subpart K it's approach number two. So if it's acquisition and rehab less than \$5,000, then you're following Subpart K, right?

All right. I do want to point out we have homework. See if I can find the homework. Okay. So the homework is also downloadable. Tomorrow we're going to be reviewing Session 1 Exercise, does the Lead Safe Housing Rule apply? I typed in here, hopefully you can see this. Assume unless otherwise noted in the question, but it's a pre-'78 unit, and this is just a good way for you to go through and figure out does lead-safe housing rule apply? So you're really answering yes or no, it shouldn't take you that long. But it'll be pretty helpful for you to apply your knowledge.

So tomorrow at 1:00 Eastern time, Les and I are going to be back again. We're going to go over the answers for the Session 1 Exercise, and then we're going to be going over the questions that came in today. So there's a lot of questions that have come in today, we're going to review those questions.

If you have more questions that came in please feel free to -- or came up while you were thinking about it, you didn't get a chance to type that in, go ahead and type those in tomorrow during our office hours. And we always try to address those first, the questions that are coming in live.

And then once we answer all those, then we're going to look at what are the questions that came in yesterday? Are there certain ones that we think everybody would benefit from? Were there

certain areas people were confused? Should we review a little more? So it's only an hour, so please join us tomorrow for our office hours. And it should be the same link, is that correct Paul? It's the same link for them to get in office hour's tomorrow is how they got in today?

Paul: I believe it'll be the same class page to find materials. It should be the same link, but I think a communication gets sent out with the link. I would check again to make sure.

Kris Richmond: Great. Thank you. So you should get another email about how to get to office hours and be able to join us tomorrow. And then just to show you again some of these handouts that we're having available to you, this is a brand new handout that we just put together. This is the treatments to lead-based paint.

So if you've downloaded this one already, I want you to go back and look at others and download it again because this morning we made a change on page two, okay? So if you've already downloaded the treatments to address lead-based paint please go back and get the new one or when we go over this document, we'll tell you how to fix this first bullet under standard treatments.

So that's a new handout we have, this handout is not new but it is also available to you. It's our summary chart. I always find it super helpful. I have it next to my desk and refer to it quite often. We have our exercises. We have the handout on the lead disclosure rule. We also have a worker qualification handout. This is also brand new.

We found the last time we trained this there was a lot of confusion about who can do what and what kind of training do people need? So we put together a worker handout, so you can see these are all the different types of workers and what kind of work can they do, and then when you scroll down, maybe to the next page it actually goes over the qualifications.

What kind of training do they need to have and where do they need to go to get this type of training? So we're really excited about that in our treatment handouts are brand new. This is our definition handout. So again, it's a couple pages long, but also really helpful, especially if you're brand new.

And then Les is going to go into more of the [inaudible] together comparing the lead-based housing rule and the RRP rule, the EPA renovation repair and painting rule, because you may have a contractor who has been trained in RRP, which is great, because we need an RRP contractor, but maybe they've never done a HUD project before.

And there are more stringent requirements in HUD lead-safe housing rule than there is for RRP. So this handout compares what the differences are. We're going to point out these differences and we go through the training. So as a practitioner, and as you hire your RRP certified renovators, you need to communicate to them this is the HUD job, and here are some extra things that you need to make sure that you're actually doing.

So if you haven't had a chance yet, please go and download these different handouts. They're all available on the class page. We're going to be referring to these as we go through the different

trainings. So Les, other questions? Or Jerry, or Bruce, or Karen, other things that have come up or things we should expand upon?

Les Warner: They're asking for -- and since we've had a couple of questions. Folks are asking if it's possible to resend the link for the documents. I think that might be a good idea. So I don't know if Paul, that's something you can send out, but that would solve, we've got questions about downloading the homework and also about the link for all the documents. So I think if we have a way to simply re send that to everyone, that would probably be really helpful.

Kris Richmond: Thanks. Other questions or areas? I know we were done a little early.

Les Warner: Only one that would [inaudible] time.

Karen Griego: Sorry Les. So we had an interesting question from one of our trainees about continuum of care project where the HUD activity triggering the lead-safe rule is leasing. However the question was, well, what do we do when the property owner decides to do maintenance or rehabilitation does Subpart J keep [inaudible] at that point?

I think [inaudible] the answer is no, unless there's a HUD funding source going into that rehabilitation job. However as I noted to the person who posed the question the EPA renovation repair and painting rule applies regardless of who funds that work.

So my recommendation is for the person, anybody that comes into contact with this kind of a scenario, which I don't imagine it's pretty common to join us for this Subpart J training, if not, because you will be expected to comply with Subpart J necessarily, but you can better inform and educate your participants and the property owners that are serving your clientele. So that was interesting and I thought that was worth sharing today.

Kris Richmond: Yeah, I agree. Karen, thank you. Other questions, go ahead Les.

Les Warner: I would just mention there was a question about well why are we exempting properties that are occupied by the elderly or disabled? I mean, I think the basis of that is the fact that they are exclusively meant for occupants that are not going to be part of our high risk population.

But we are training you on what the lead-safe housing rule when it is triggered, but it doesn't mean that if you were the property owner, you were providing funding to a property that you couldn't say, let's go ahead and do lead hazard reduction work as part of this, even if it was an exempted building.

But we're really training you on, when is the -- when are the rules triggered and what are the requirements on that, you still, as a grantee can choose to, because you believe it makes good sense go beyond what the requirements might require.

Kris Richmond: Great. Anything else? My HUD team anything else you want to share today? All right. I'm not hearing anybody else say anything. So please go and download the homework

do the homework and Les and I and Bruce and Jerry and Karen will be back tomorrow, 1:00 Eastern time to review the homework and to answer any new questions you have as well as go ahead and summarize any other questions. Les, anything else I see you've popped back up?

Les Warner: No, just thought I'd say goodbye.

Kris Richmond: Okay. Well, thanks everybody. Thanks for your time and your investment today. I really appreciate you joining us and we look forward to seeing you tomorrow. Bye everybody.

(END)