Lead Safe Housing Rule Amendment Training

For TBRA Participants

September 2019
Welcome

• Trainers
  • Phil Jones, ICF
  • Kris Richmond, ICF
• Questions –
  • Written Questions: Enter your question into the Q&A text box at any time during the presentation, submit question to “All Panelists”. The questions will be read aloud if time permits.
  • Troubleshooting Questions: Submit questions using the Chat text box, submit question to Host.

• 90 minutes
• Will be recorded and posted on HUD Exchange
Training Goals and Agenda

1. Review the purpose, rules and requirements of the Lead Safe Housing Rule (LSHR)
2. Learn about the key definitions and new requirements of the LSHR amendment and how to meet them
3. Focus on response to reported EBLL in children in our units
4. Identify other available resources
Sources of Lead

• Lead is a naturally occurring element found in all parts of the environment including dirt
• Past use of leaded gasoline, foundries, smelters, and mining
• Household sources of lead
  ▪ Paint in homes built before 1978
  ▪ Water pumped through lead pipes and plumbing fixtures
  ▪ Certain imported items including some clay pots, toys, jewelry, and home remedies
Exposure to Lead

How do children get lead in their blood?

• Crawling or playing anywhere there is lead dust or contaminated soil

• Putting their hands or other lead-contaminated objects into their mouths

• Eating paint chips found in homes with peeling or flaking lead-based paint
Federal Lead Regulations

**HUD – 24 CFR Part 35**
- Subpart A: Lead Disclosure Rule
- Subpart B: General LSHR Requirements & Definitions
- Subpart H, 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

*Recent changes in the EPA rule will go into effect on January 6, 2020.*
## TBRA: Subparts and Applicable Programs for 24 CFR 35

<table>
<thead>
<tr>
<th>Subpart</th>
<th>Assistance</th>
<th>Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td>M</td>
<td>Tenant-Based</td>
<td>• Section 8 certificate and housing choice voucher programs (HCV)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• HOME program</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Continuum of Care program</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Housing Opportunities for Persons with AIDS</td>
</tr>
<tr>
<td></td>
<td></td>
<td>• Indian Housing Block Grant program</td>
</tr>
</tbody>
</table>
Key Definitions (ref. §35.110)

• **Target Housing** – built before 1978, with some exceptions

• **Lead-Based Paint Hazards**
  - Deteriorated LBP
  - Dust-lead at or above the dust-lead hazard standard
  - Soil-lead at or above the soil-lead hazard standard
  - Friction, impact or chewable surfaces with LBP and an associated dust-lead hazard

• **Lead-Based Paint** – 1.0 mg/cm²
Lead Safe Housing Rule Applies Except When:

*Information from 24 CFR 35.115*

- Property constructed on or after January 1, 1978
- Zero-bedroom and Single-Room Occupancy units
  - **Exemption does not apply** if a child less than age 6 resides or is expected to reside in the dwelling unit
- Housing for the elderly, or a residential property designated exclusively for persons with disabilities
  - **Exemption does not apply** if a child less than age 6 resides or is expected to reside in the dwelling unit
Lead Safe Housing Rule Applies **Except When (Cont.):**

- Properties found to be LBP free by an inspection, or where all LBP has been identified, removed, and clearance achieved
- An unoccupied property that is to be demolished and remains unoccupied until demolition
- Emergency repairs to protect life, health, safety or structure
- Rehabilitation that does not disturb a painted surface
- Compliance with requirements for testing and remediation may be reasonably delayed due to adverse weather conditions
## Key Terms

<table>
<thead>
<tr>
<th><strong>Visual Assessment</strong></th>
<th>An inspection to identify deteriorated paint chips, dust and other debris, AND determine if all previous hazard control measures are intact</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Risk Assessment</strong></td>
<td>An inspection following a detailed protocol using chemical testing and/or XRF technology to identify LBP and 4 types of LBP hazards</td>
</tr>
<tr>
<td><strong>Clearance</strong></td>
<td>An inspection following a specific protocol using combined visual and quantitative environmental evaluation procedures to determine no LBP hazards remain</td>
</tr>
</tbody>
</table>
Key Steps in HUD Lead Regulatory Compliance

- **Disclose**: Pamphlet, lead warning, knowledge
- **Evaluate**: Visual assessment → Risk assessment, inspection
- **Hazard Reduction**: Paint stabilization, interim controls, abatement
- **Clear**: Pass clearance
- **Notify**: Notify residents
- **Maintain**: Ongoing LBP maintenance → Visual assessment, re-evaluation

Records must be kept at least 3 years after LSHR requirements expire. Some programs have longer record retention periods.
Lead Disclosure Rules
Subpart A

• Applies to all pre-1978 for sale and rental units (unless exempt)

• The Owner or Lessor:
  • Provides pamphlet
  • Provides proper disclosure form
  • Discloses ALL KNOWN information (LBP, evaluations, hazards, and remediation)

• Must be completed and signed copy retained BEFORE any contract is signed
Lead Disclosure Rule: The Wrong Disclosure
Lead Disclosure Rule: The Correct Disclosure

www.hud.gov/program_offices/healthy_homes/enforcement/disclosure

Lead Safe Housing Rule (LSHR)

Subparts B-R

• Protect children in assisted target housing through *primary prevention by hazard identification and control or removal*

• Primary prevention methods depend on type of assistance and, in some cases, amount

• Effectiveness assured through certifications, training, evaluations
Lead-Based Paint Methods and Standards
Subpart R

• Provides standards and methods for evaluation and hazard reduction activities required in subparts B, C, D, and F through M of the LSHR

• Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (2012 Edition)
  ▪ Provides detailed protocols and methodologies not found in the Rule
| TBRA Summary of LBP Requirements | Tenant-Based Rental Assistance*  
[Subparts A, B, M, & R] |
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>*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.</td>
<td></td>
</tr>
<tr>
<td>Disclosure (almost all pre-1978 units regardless of occupancy)</td>
<td>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.</td>
</tr>
<tr>
<td>Exemptions</td>
<td>See list of property exemptions under the Lead Safe Housing Rule.</td>
</tr>
<tr>
<td>Approach to Lead Hazard Evaluation and Reduction</td>
<td>Identify and stabilize deteriorated paint</td>
</tr>
<tr>
<td>Pre-Renovation Education (EPA Requirement)</td>
<td>Entity performing any rehabilitation, repair, or lead hazard reduction must provide EPA RRP Renovate Right pamphlet to residents prior to start of work.</td>
</tr>
<tr>
<td>Lead Evaluation or Visual Assessment</td>
<td>Visual assessment</td>
</tr>
</tbody>
</table>
| Lead Hazard Reduction | Paint stabilization  
Safe work practices & occupant protection  
Work must be performed by personnel with proper training or supervisor |
| Clearance and Notification | Clearance is required following abatement, interim controls, and paint stabilization (unless area controlled or stabilized is de minimis)  
Notice to occupants describing hazard reduction activities including clearance. |
| Ongoing Maintenance | Annual visual assessment to check for failure of lead hazard reduction work or defective paint.  
Safely repair deteriorated paint (unless no LBP present) and pass clearance. Safely repair any failed lead hazard reduction work, pass clearance, and provide notice to residents. |
| 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 | Test deteriorated paint.  
Use safe work practices only on lead-based paint surfaces |
Ongoing Maintenance

Maintain the unit and common areas lead safe for continued occupancy.*

Lead safe means no deteriorated lead paint or failed hazard control methods.

<table>
<thead>
<tr>
<th>Who</th>
<th>Owner (TBRA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>What</td>
<td></td>
</tr>
<tr>
<td>1.</td>
<td>Ensures a trained visual assessor conducts regular visual assessments</td>
</tr>
<tr>
<td>2.</td>
<td>Responds to and clears new or deteriorated LBP hazards identified in the assessment</td>
</tr>
<tr>
<td>3.</td>
<td>Repairs any failed encapsulation or enclosure controls</td>
</tr>
<tr>
<td>4.</td>
<td>Written notice asking residents to report deteriorated paint and any failure of encapsulation or enclosure</td>
</tr>
<tr>
<td>When</td>
<td>Visual assessments at unit turnover and every twelve months</td>
</tr>
</tbody>
</table>

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

• Trained to conduct Visual Assessment
  • Identifying deteriorated paint and visible dust (Not LBP)

• Can be owner, owner staff, grantee

• Must complete online Visual Assessment training found on HUD.Gov at

https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm
EPA Renovation Repair Painting (RRP) Rule
Contractors performing renovation repair and painting projects that disturb LBP in homes, child care facilities and pre-schools built before 1978, must (with some exceptions):
• 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
• At the end of HUD-assisted work, conduct clearance
Finding Appropriate Firms and Individuals

- 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

- Contact the local entitlement (CDBG/HOME) grantee for referrals

- Contact Lead-Based Paint Hazard Control Grantees
HUD has modified the LSHR to enhance the protections from lead-based paint hazards that the current regulations provide.
Lead Safe Housing Rule

HUD – 24 CFR Part 35

- Subpart A: Lead Disclosure Rule
- Subpart H, L, M: LSHR Program Requirements
- Subpart R: LSHR Methods & Standards
### Additional Key Terms

<table>
<thead>
<tr>
<th>Term</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Index Unit</strong></td>
<td>A housing unit where a child with an elevated blood lead level resides.</td>
</tr>
<tr>
<td><strong>(Other) Covered Units</strong></td>
<td>Federally-assisted housing units in the <em>property</em> where a child under 6 years old lives or is expected to live.</td>
</tr>
<tr>
<td><strong>Environmental Investigation</strong></td>
<td>A full Risk Assessment plus interviews and testing to determine what other factors that may have contributed to the child’s EBLL</td>
</tr>
</tbody>
</table>
Designated Party and the EBLL Response

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

<table>
<thead>
<tr>
<th>Subpart M</th>
<th>TBRA</th>
<th>Owner/Grantee</th>
</tr>
</thead>
</table>

- **EBLL Response Activities**: The activities are the same, but the designated party changes for each type of assistance
Amendments to LSHR

• Enforceable since 7/31/2017
• Major changes include:
  ▪ Bring definition of Elevated Blood Lead Level (EBLL) in line with CDC (reduce to 5 µg/dL or greater)
  ▪ Enable HUD to change the EBLL in the future should the CDC threshold (reference level) change
Amendments to LSHR (Cont.)

When a child is found with an Elevated Blood Lead Level

• *Enhance* the assessment in that child’s unit from a Risk Assessment to an Environmental Investigation

• *Add* a requirement that every assisted unit in the property occupied by a child under 6 years old receive a Risk Assessment with Lead Hazard Control of any lead-based paint hazards (if LBP hazards in Index Unit)

• *Add* a requirement that HUD be notified for the major types of housing assistance that have an Elevated Blood Lead Level requirement
EBLL case reported for a child under age six in an assisted housing unit...
Responding to EBLLs: Index Unit – Verification of EBLL

If original EBLL report did not come from a health care provider or local public health department, immediately verify the child's blood lead level with one of those sources.

<table>
<thead>
<tr>
<th>Who</th>
<th>PHA (Section 8 TBRA); PJ/Grantee (TBRA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>What</td>
<td>Verifies the EBLL with health care provider or public health department</td>
</tr>
<tr>
<td>When</td>
<td>Immediately</td>
</tr>
<tr>
<td>How</td>
<td>Need not be written verification</td>
</tr>
</tbody>
</table>
What if no initial medical verification is received?

Owner or PHA/Grantee must...

• Contact your HUD Program Representative (HUD Rep) regarding the no response.
  • The HUD Rep will either proceed to verify independently or contact OLHCHH to assist with verification.
  • You may also continue to attempt to verify the EBLL.
• Keep records of all attempts (yours and HUD’s) to verify the EBLL with the public health department or health care provider.
• Avoid unnecessary delays that slow down the response.
Information Privacy

Information emailed/shared with HUD/TAG should not include the child’s name or blood result, unless done in a secure manner.

• This is considered personally identifiable information (PII), and is also confidential medical information that must be maintained in accordance with the PHA’s/grantee's policy for private medical information.

• If the PHA/grantee must transmit PII, it shall be done in a secure manner or in an encrypted email.

• For more information on Privacy Protection Guidelines for PHAs, see Notice PIH 2015-06.
TBRA - Responding to EBLLs: Index Unit

What if the child has moved by the time the Designated Party receives notification?

• If any other household receiving TBRA is living in the unit or is planning to live there, EBLL response requirements still apply to the unit.
TBRA Data Matching and Sharing

• Quarterly data sharing and data matching with the health department is a requirement of the LSHR that predates the 2017 amendment.

• PHAs/Grantees can share a list of TBRA addresses with the health dept. or the health dept. can share addresses for children with EBLL with the PHA/Grantee.

• PHA/Grantee must:
  ▪ Ensure this information is protected, maintained as confidential, and is used only for the public health protection of children and families from lead exposure.
  ▪ Keep records of attempts to comply with data matching requirement.
EBLL case information provided or confirmed by health department or medical health provider

Next, Notify and investigate!
Responding to EBLLs: Index Unit – Notify 3 Entities

Notify: Local health department, Local HUD Field Office, and HUD OLHCHH (LeadRegulations@hud.gov)

<table>
<thead>
<tr>
<th>Who</th>
<th>Owner (TBRA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>What</td>
<td>Notifies local health department and HUD (if case was not reported by it)</td>
</tr>
<tr>
<td>When</td>
<td>Within five business days of receiving verified report</td>
</tr>
</tbody>
</table>
| How     | HUD recommends using email  
Do not include child’s name or test results |
Responding to EBLLs: Index Unit – Notice to HUD

What to include in notification to HUD Field Office and HUD Office of Lead Hazard Control and Healthy Homes:

• PHA code and name (if PHA providing info) OR owner name and address (if owner providing info)
• Date of EBLL test result
• Housing program (e.g., public housing, PBA, TBRA)
• Unit address and (if in multi-unit property) the development name
• Whether the PHA or owner has notified the local health department of the EBLL, or been notified by the local health department, and the date of that notification
Responding to EBLLs: Index Unit - Investigate

Ensure that a certified lead risk assessor performs an *Environmental Investigation (EI)*.

<table>
<thead>
<tr>
<th>Who</th>
<th>PHA/grantee (TBRA); Certified risk assessor</th>
</tr>
</thead>
<tbody>
<tr>
<td>What</td>
<td>Certified risk assessor performs an EI</td>
</tr>
<tr>
<td>When</td>
<td>Within 15 calendar days of receiving report</td>
</tr>
<tr>
<td>How</td>
<td>Find certified assessors by contacting the state lead licensing agency or visit <a href="http://www.epa.gov/lead">www.epa.gov/lead</a>.</td>
</tr>
</tbody>
</table>

Ensure that a certified lead risk assessor performs an *Environmental Investigation (EI)*.
Risk Assessors and Inspectors

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

• The PHA/grantee can rely on results of health department’s evaluation of the EBLL child’s home and environment.

• Many local public health departments conduct its lead poisoning prevention services or can arrange for such services.

• The health department may evaluate a child’s home for lead-based paint hazards and other possible sources of lead exposure when a child is found with an EBLL.
Results of environmental investigation received...

Next, Notify others of the results of the EI!
Responding to EBLLs: Index Unit - Notify

Notify local HUD Field Office and the family of the results. If LBP hazards were identified, also notify all assisted residents that an EI was completed.

<table>
<thead>
<tr>
<th>Who</th>
<th>PHA/grantee (TBRA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>What</td>
<td>Notifies HUD Field Office, EBLL family, and other building residents but NOT identity of the EBLL family</td>
</tr>
<tr>
<td>When</td>
<td>Within 10 business days of receiving results for HUD Field Office and within 15 calendar days for resident notifications</td>
</tr>
<tr>
<td>How</td>
<td>By letter/notice delivered to each assisted unit, since central posting of EI notice may reveal private health information</td>
</tr>
</tbody>
</table>
Notice of Evaluation

Notices of evaluation to HUD and residents must include the date the investigation was completed, because the investigation is only valid for one year.
Addressing Non-LBP Lead Hazards in EI

What If the EI does not identify LBP hazards (of paint, dust or soil) in the index unit...

• Residents should be encouraged to follow the EI’s recommendations for controlling other household sources of lead (for example, water, take-home exposures, imported jewelry, pottery, and folk remedies).

• PHAs/grantees and owners may assist the family directly or coordinate with the health department to encourage the family to eliminate non-LBP hazards identified in the EI.

• EBLL response for the index unit is complete after the PHA/grantee (for TBRA) notifies the family of the results. PHA/grantee should maintain records.
Did the EI Identify LBP Hazards?

If the EI identifies lead-based paint hazards in the index unit...

• Owner (for TBRA) is responsible for controlling and clearing all hazards from housing sources.
Environmental investigation identified lead-based paint hazards...

Next, Control and Protect
# Responding to EBLLs: Address Index Unit Hazards

<table>
<thead>
<tr>
<th>Who</th>
<th>Certified LBP abatement firm or certified lead renovation firm</th>
</tr>
</thead>
<tbody>
<tr>
<td>What</td>
<td>Ensure all LBP hazards identified by EI are controlled in the index unit and relevant common areas and pass clearance</td>
</tr>
<tr>
<td>When</td>
<td><strong>Within 30 calendar days</strong> of receipt of EI results</td>
</tr>
<tr>
<td>How</td>
<td>Lead hazard reduction</td>
</tr>
</tbody>
</table>
Responding to EBLLs: Identify “Covered Units”

If an Index unit with LBP hazards is in a property with multiple federally assisted units, then:

• Risk Assessment is required for other assisted target housing units in the property where children under age six reside or are expected to reside (known as other “covered units”), AND

• Those units are likely to need hazard control work, so you might want to identify all the work needed before you start on one.

• Residents of other covered units can be notified of risk assessment results through a central posting or individual notifications.
Guidelines for Sampling Other Covered Units for Risk Assessments

• Sampling of units is permitted for:
  • Properties built before 1960 and with more than 20 covered units
  • Properties built between 1960 and 1977 and with more than 10 covered units

• Table 7.3 in HUD’s Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing provides guidance on the sample sizes required.

• The certified lead-based paint risk assessor will design and implement the sampling protocol.
Sampling Detail for Other Covered Units

• If lead-based paint hazards are found in a sample of covered units, they are presumed to exist in all the other covered units that were not sampled.
  ▪ The hazards are presumed to be present on the same type of building components (e.g., bedroom window sills) as had hazards in the sampled units.
  ▪ Components that were found not have hazards in sampled units do not have to be treated.
Did the Risk Assessments Identify LBP Hazards?
No!

If risk assessments did not identify LBP hazards in other covered units, PHA/owner must:

- **Notify** covered unit residents and HUD Field Office of results
- **EBLL response complete regarding other covered units**
Addressing Hazards in Response to EBLLs: Timing

If unit in a property with multiple federally-assisted units and index unit is found to contain LBP hazards then:

• Hazards in the index unit must be addressed and clearance completed by certified firm(s) within **30 calendar days** of the receipt of EI results by Designated Party.

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

• Interim control of other LBP hazards in other covered units must be conducted within
  • **30 days** for a property with ≤ 20 other covered units with LBP hazards, and
  • **90 days** for a property with > 20 other covered units with LBP hazards
Responding to EBLLs: Best Practice

• Plan ahead with your risk assessor for contingencies

• Assure risk assessor understands all of the timing and scope implications

• Discuss sampling options and the cost implications of sampling plus presumption

• If possible, discuss risk assessor recommendations before final report to assure that timing and cost are addressed and viable, but then follow the recommendations re staging of work, protections, relocation, etc.
Responding to EBLLs: Best Practice (Cont.)

• Some types of work require complete isolation, or containment, of work area and/or full evacuation of residents and their belongings.
  ▪ Other jobs require much less site preparation and containment.

• Temporary relocation is necessary if residents do not have access to kitchens or bathrooms during non-work hours.
  • Relocate to a lead safe unit (i.e. constructed after 1978; passes visual assessment and dust sampling)
Abatement vs. Interim Controls

• For TBRA: Decision is up to the owner, but PHA/grantee can advise the owner that abatement reduces need for future reevaluation and hazard control work.
When is Control Work Complete?

• All lead hazards identified in the course of the investigation should be eliminated or controlled.
• No interim control or abatement project is complete until compliance with clearance standards has been achieved, if required, and final report prepared.
Responding to EBLLs: Notify Work Complete & Clearance Achieved

Notify all assisted residents and provide documentation to HUD Field Office when work on index and other covered units is complete.

<table>
<thead>
<tr>
<th>Who</th>
<th>Owner (TBRA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>What</td>
<td>Notifies other property residents and local HUD Field Office of each hazard reduction activity completed</td>
</tr>
<tr>
<td>When</td>
<td>Notifies property residents <strong>within 15 calendar days</strong> and the local HUD Field Office <strong>within 10 business days</strong> of completion</td>
</tr>
<tr>
<td>How</td>
<td>By central posting or distribution to each unit, for property residents</td>
</tr>
</tbody>
</table>
Summary of Actions if LBP Hazard Found

If risk assessments did identify LBP hazards in ANY assisted units, PHA/owner must for:

- **Notify** all residents in assisted units and HUD Field Office
- **Protect** families in those units
- **Control** (and clear)
- **Notify** residents and HUD Field Office
- **Maintain** housing as lead-safe
- **Reevaluate** units
- **EBLL response complete**
<table>
<thead>
<tr>
<th>EBLL Response Activity</th>
<th>Timeframe</th>
</tr>
</thead>
<tbody>
<tr>
<td>Notify Public Health Dept. and HUD FO of EBLL case</td>
<td>Within 5 business days after verification of EBLL</td>
</tr>
<tr>
<td>Conduct Environment Investigation for Index Unit</td>
<td>Within 15 calendar days after verification of EBLL</td>
</tr>
<tr>
<td>Notify HUD FO of results of EI</td>
<td>Within 10 business days of receiving results of the EI</td>
</tr>
</tbody>
</table>
| Conduct Risk Assessment for Covered Units                   | a. Within 30 calendar days for property with ≤ 20 covered units after EI results  
|                                                           | b. Within 60 calendar days for property with > 20 covered units after EI results  |
| Complete lead hazard control work and clearance            | Within 30 calendar days of receiving results of EI                          |
| Interim control of other LBP hazards in other covered units | a. Within 30 calendar days for property with ≤ 20 covered units w/ LBP hazards after RA results  
|                                                           | b. Within 90 calendar days for property with > 20 covered units after RA results  |
| Notify HUD FO of clearance                                 | Within 10 business days after clearance                                    |
| Notify assisted resident of clearance                       | Within 15 calendar days after clearance                                    |
Next Steps and Additional Resources
Steps to Ensure Full Compliance with the Lead Safe Housing Rule

• Ensure that all lead-based paint testing required under the existing LSHR is already completed and that records are securely stored at the property and are available for inspection and disclosure.

• Determine whether lead evaluations and hazard control work will be performed by trained, certified staff or through certified contractors.

• Identify a current contact person at the local or state health department for communication.

• Inform residents of the risks of lead-based paint and encourage them to have young children tested.
Resources

• OLHCHH homepage
  www.hud.gov/lead

• LSHR (24 CFR part 35, subparts B – R):
  www.hud.gov/program_offices/healthy_homes/enforcement/lshr

• LSHR EBLL amendment (1/13/2017):
  www.federalregister.gov/d/2017-00261

• EBL Amendment Notice PIH 2017-13:

• OLHCHH Grantees
Resources (Cont.)

• Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing:
  www.hud.gov/program_offices/healthy_homes/lbp/hudguidelines

• Resources for PHAs:
  www.hud.gov/program_offices/public_indian_housing/leadbasedpaint

• LBP Compliance Advisor:

• Interpretive Guidance on HUD’s LSHR:
  https://www.hud.gov/sites/documents/DOC_25476.PDF

• Interpretive Guidance on HUD-EPA Lead Disclosure Rule (three parts):
  www.hud.gov/program_offices/healthy_homes/enforcement/disclosure
Thank you for joining us!

Email your questions, comments, and suggestions to:

leadregulations@hud.gov