



Owner's Guide to identifying and tracking occupants and expected occupants <6 years old

For tenant-based rental assistance, zero-bedroom units, and units designated for the elderly or disabled

To demonstrate compliance with the Lead Safe Housing Regulations, owners must maintain records that make it easy to identify those units with any occupants and expected occupants <6 years old and know the age of those occupants. These records can be incorporated into the property rent roll or kept in a separate log.

Occupants are those persons who have a right by lease to reside in the assisted unit currently or in the future. Persons on a waiting list are not considered "occupants" or "expected to reside." Occupants must be identified to the owner and owners must inform tenants that ALL occupants residing or expected to reside at the property must be identified to the owner and birth dates provided for all children. The reason a child is expected to reside in the unit is irrelevant and should **not** be investigated or recorded. Anytime any child under 6 joins the household, they must be reported to the owner and their name and birth date included on the owner's records.

The presence of a child under 6 in any TBRA, zero-bedroom, designated elderly or disabled-assisted unit triggers the requirement for compliance with the LSHR in addition to other requirements such as the EPA's Renovation, Repair or Paint (RRP) Program rule. It is recommended that the information about children under 6 be included in both the rent roll, and the property inspection schedule and repair records.

In particular, the occupancy or expected occupancy by such child results in:

- Requirement for annual visual assessments for deteriorated paint in that unit and common areas
- Requirement for more rigorous hazard control practices and third-party professional clearance testing requirements any time paint is disturbed in the unit or related common areas
- Requirement for an Environmental Investigation and Risk Assessment and hazard remediation by trained and certified professionals with any unit where a child under 6 has a verified Elevated Blood Lead Level (EBLL), and
- If lead-based paint hazards were found in the EBLL unit, risk assessments, hazard remediation and clearance for all other child-occupied, assisted units and common areas in the building or development.

Note that it is **not permissible to discriminate** on the basis of this information. It is, however, required to gather the information by making disclosure by the applicant or tenant (of child occupancy) mandatory.