



Agency Priority Goal Action Plan

Protect Families from Lead-Based Paint and Other Health Hazards

Goal Leader:

Matthew Ammon, Director of the Office of Lead Hazard Control and Healthy Homes

Overview

Goal Statement

- Protect families from lead-based paint and other health hazards by making an additional 15,400 at-risk housing units healthy and lead-safe by the end of FY 2020.

Challenge

- More than 22 million homes nationwide (34 percent of the homes built before 1978) have significant lead-based paint hazards. Young children are especially at risk for the harmful effects of lead, to which even low-level exposure can increase the likelihood of behavioral problems, learning disabilities, seizures, and, in extreme cases, death.

Opportunity

- HUD's Lead-Based Paint Hazard Control and Lead Hazard Reduction grants have a proven track record across the country of lowering the elevated blood lead levels of children and reducing incidents of future exposure. HUD has made nearly 400,000 homes lead-safe and is well positioned to continue to make progress towards the goal of protecting families from lead-based paint hazards.

Leadership

Core Team:

Matthew Ammon, Director
Office of Lead Hazard Control and Healthy Homes



Michelle Miller, Deputy Director
Office of Lead Hazard Control and Healthy Homes



Goal Structure & Strategies

Childhood lead poisoning remains the most pervasive, yet preventable, environmental health problem in the United States. Given that about 22 million (34%) of occupied housing built before 1978 contain significant lead-based paint hazards, and of them, about 3.6 million have children under age 6, it is critical that communities, health departments, building owners and managers, and tenants be made aware of the many tools and resources that HUD and its partners provide to identify and reduce lead-based paint hazards. Therefore, HUD will focus on increasing community awareness of lead and other health and safety hazards in homes to increase participation in HUD and stakeholder programs and services.

HUD will leverage its public-private partnerships and relationships in the health community to maximize the impact of its lead-safety and healthy housing investments, while also improving its data quality. Through data sharing among HUD, CDC, EPA, and state and local governments, it is possible to identify communities and neighborhoods with elevated risk for lead exposure, especially by children under age 6. Such analysis has potential to improve targeting of HUD's lead hazards grants and funded mitigation activities and put dollars to work where it will have the greatest impact.



Summary of Progress – FY 19 Q3

In the first three quarters of FY 2019, HUD made at least 9,319 housing units lead-safe, including 3,471 units through its various lead hazard control and reduction grants, and 5,848 units through its Lead Safe Housing Rule compliance activities.

On December 19, 2018, the Presidential Task Force on Environmental Health Risks and Safety Risks to Children issued the Federal Lead Action Plan to Reduce Childhood Lead Exposures and Associated Health Impacts, the development of which was co-chaired by HUD, EPA, and HHS. HUD is accomplishing activities under the Action Plan, and will issue its first HUD Implementation Plan status report by the end of FY 2019.

On December 19, 2018, HUD awarded \$139 million in FY 2018 Lead-Based Paint Hazard Reduction grants. On June 25, 2019, HUD opened the FY 2019 Notice of Funding Availability for this program, with applications received by August 9 and awards expected to be made by the end of FY 2019. As with the 2018 program, the 2019 program has multiple areas in which stakeholder relationships are emphasized.

Key Milestones

Increase community awareness of lead and other health and safety hazards in homes to increase participation in HUD and stakeholder programs and services.

Milestone Summary				
Key Milestone	Milestone Due Date	Milestone Status	Change from last quarter	Comments
Host National Healthy Homes Conference	6/30/18	Complete	No	Held June 25-28, 2018, in Anaheim, CA, with the National Environmental Health Association. HUD used the conference to publicly launch this APG and build stakeholders' energy and commitment to set their own ambitious goals for FY 2018-2019.
Publish FY 2018 Lead-Based Paint Hazard Reduction NOFA	6/30/18	Complete	Yes	Published June 19, 2018, the FY 2018 Notice of Funding Availability has multiple areas in which community awareness and stakeholder relationships are emphasized. Published June 25, 2019, the FY 2019 NOFA does as well.
Update Interagency Federal Lead Strategy	3/31/19	Complete	Yes	On December 19, 2018, HUD, U.S. Environmental Protection Agency, and U.S. Department of Health and Human Services issued the Federal Lead Action Plan to Reduce Childhood Lead Exposures and Associated Health Impacts (Lead Action Plan). HUD is preparing its first HUD Implementation Plan status report under the Action Plan.

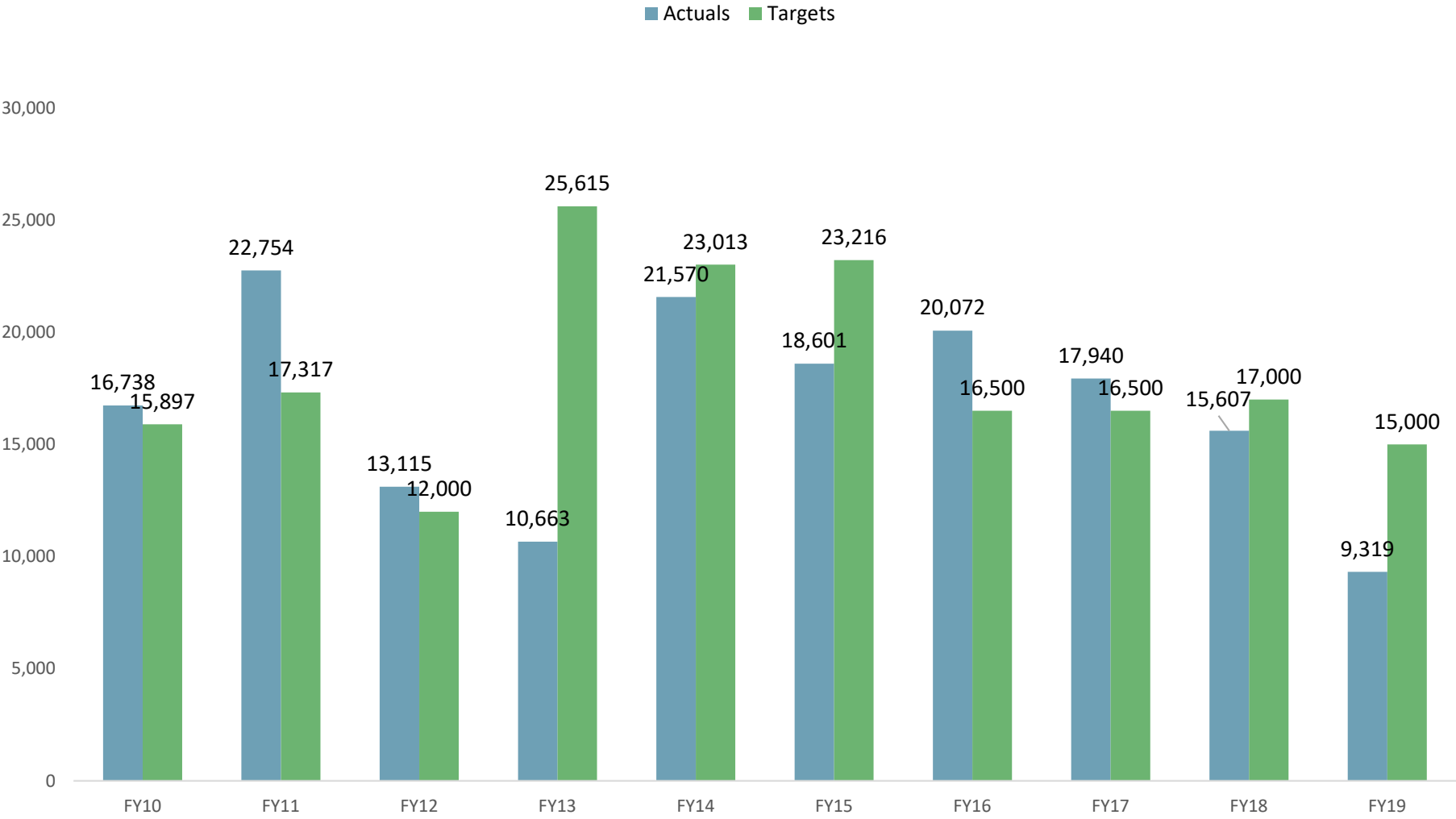
Key Milestones

Design and deliver targeted lead and healthy homes programs through improvements in data quality and access.

Milestone Summary				
Key Milestone	Milestone Due Date	Milestone Status	Change from last quarter	Comments
Draft data-sharing agreement with HHS to identify children with blood lead levels (BLL) >5 mcg/dL also receiving Medicaid or enrolled in Head Start/Early Head Start programs	9/30/2018	Complete	Yes	In the FY 2018 and 2019 Lead-Based Paint Hazard Reduction NOFAs, HUD considers formal arrangements by applicants with state Medicaid agencies for use in identifying children with elevated blood lead levels, as part of rating applications. HUD continues to collaborate with HHS/CMS on encouraging state participation in this effort.
Identify high lead-risk communities through data mapping	9/30/2018	Complete	Yes	HUD has identified factors associated with high lead-risk communities, used them to map such communities, and used the data mapping in the FY 2019 Lead-Based Paint Hazard Reduction NOFA published June 25, 2019 in rating applications; awards to be made in FY 2019.
Advance the research agenda on the effects, evaluations and control of lead and other health and safety hazards in housing and the impacts on resident health.	9/30/2018	Complete	Yes	HUD/PIH launched its Elevated Blood Lead Level (EBLL) Tracking Portal for public housing agencies and other assisted housing owners to report EBLL cases. OLVHCHH published the NOFA for Lead Technical Studies and Healthy Homes Technical Studies grants on June 11, 2019, to be awarded in FY 2019.

Key Indicator #1

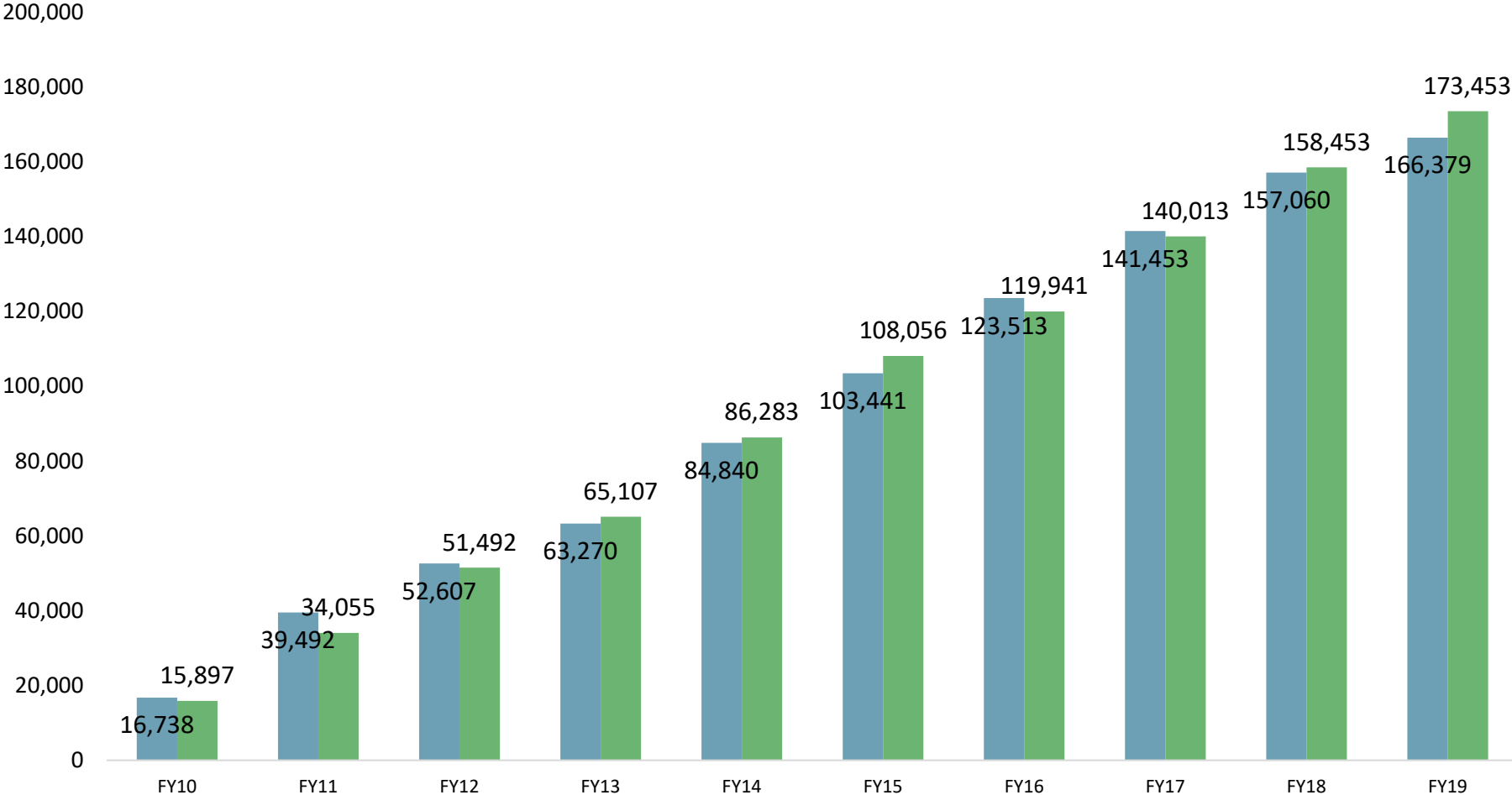
Units Made Lead-Safe and Healthy with HUD dollars, FY 2010-19 (incremental)



Key Indicator #1 (continued)

Units Made Lead-Safe and Healthy with HUD dollars, FY 2010-19 (cumulative)

Actuals Targets



Data Accuracy and Reliability

Number of at-risk HUD housing units made healthy, physically safe and lead-safe

Office of Healthy Homes and Lead Hazard Control programs

Lead Hazard Control Grants

- Description: Number of housing units made lead-safe through lead hazard control grants.
- Data source: Grantee reports to Healthy Homes Grant Management System
- Unit of measurement: Housing units
- Dimension: Count
- Calculation method: Total of units from each grantee
- Frequency: Quarterly
- Direction: Increase
- Data quality (limitations/advantages of the data): Units are counted only after payment has been made after lead hazard control work has been done and the units have been cleared for re-occupancy, so grantees have a fiduciary responsibility to report accurately; but some grantees report on a single unit more than once, as they make partial and then final payments.
- Validation, verification, and improvement of measure: Reports are validated against financial payments (LOCCS reporting), and verified by remote and on-site monitoring by grant Government Technical Representatives. Having software checks for duplicate counting of units would improve the measure.

Healthy Housing Grants

- Description: Number of housing units made healthier and/or safer through healthy homes grants.
- Data source: Grantee reports to Healthy Homes Grant Management System
- Unit of measurement: Housing units
- Dimension: Count
- Calculation method: Total of units from each grantee
- Frequency: Quarterly
- Direction: Increase
- Data quality (limitations/advantages of the data): Units are counted only after payment has been made after hazard control work has been done and re-occupancy has been allowed, so grantees have a fiduciary responsibility to report accurately; but some grantees report on a single unit more than once, as they make partial and then final payments.
- Validation, verification, and improvement of measure: Reports are validated against financial payments (Line of Credit Control System reporting), and verified by remote and on-site monitoring by grant Government Technical Representatives. Having software checks for duplicate counting of units would improve the measure.

Data Accuracy and Reliability (continued)

Number of at-risk HUD housing units made healthy, physically safe and lead-safe

Office of Healthy Homes and Lead Hazard Control programs (continued)

Lead Hazard Enforcement

- Description: Housing units made lead-safe per agreements or orders under the Lead Disclosure Rule.
- Data source: Property owner/property manager reports
- Unit of measurement: Housing units
- Dimension: Count
- Calculation method: Total of units from each owner/manager
- Frequency: Quarterly
- Direction: Increase
- Data quality (limitations/advantages of the data): Units are counted only after the owners/managers have documented completing work and the units have been tested and for low lead levels that would allow re-occupancy, so owners/managers face economic and/or court sanctions for not reporting accurately; but limitations on HUD staffing and travel funding preclude on-site quality control checking.
- Validation, verification, and improvement of measure: Lead hazard control work is validated by consistency checks on records from owners/managers, and verified by EPA- or State-certified lead risk assessors; measure could be improved with routine on-site quality control checking by HUD lead program enforcement and/or its lead enforcement partners.

Community Planning & Development programs

Lead Safe Housing Rule (LSHR) - HOME-CDBG-HOPWA

- Description: Housing units made lead safe through work under HUD's Lead Safe Housing Rule.
- Data source: Reporting by funding recipients as tracked by the Integrated Disbursement and Information System (IDIS)
- Unit of measurement: Housing units
- Dimension: Count
- Calculation method: Total of units from each funding recipient
- Frequency: Quarterly
- Direction: Increase
- Data quality (limitations/advantages of the data): Units are counted only after payment has been made for completing work and allowing re-occupancy, so funding recipients have a fiduciary responsibility to report accurately; routine on-site quality control checking for lead results by HUD lead program enforcement and/or its lead enforcement partners is not conducted.
- Validation, verification, and improvement of measure: Reports are validated against financial payments (LOCCS reporting), and verified by remote and on-site monitoring by CPD representatives. Measure would be improved by routine on-site quality control checking for lead results by HUD lead program enforcement and/or its lead enforcement partners.

Additional Information

Contributing Programs

Organizations:

- **HUD:** Office of Lead Hazard Control and Healthy Homes (OLHCHH); Office of Community Planning and Development (CPD); **Department of Health and Human Services, Environmental Protection Agency.**

Program Activities:

- **OLHCHH:** Lead Hazard Control Grants. **CPD:** Lead Safe Housing Rule compliance through the Home Investment Partnerships Program (HOME), Community Development Block Grants (CDBG), and the Housing Opportunities for Persons With AIDS Program (HOPWA).

Regulations:

- Residential Lead-Based Paint Hazard Reduction Act of 1992; Housing and Urban Development Act of 1970; HUD Lead Disclosure Rule, 24 CFR 35, subpart A; HUD Lead Safe Housing Rule, 24 CFR 35, subparts B-R.

Other Federal Activities:

- HUD worked with EPA, HHS and other to develop the Federal Lead Action Plan. HUD is also works with CDC on data sharing on elevated blood lead levels (EBLL) for children, and with CMS on encouraging testing of young children's blood for lead. This data will help inform future metrics on reducing EBLLs.

Stakeholder / Congressional Consultations

HUD facilitates regular Program Manager School events to onboard new grantees, provide advice and share best practices, answer questions and concerns, and to solicitate feedback through open forums to identify ways to improve HUD's programs and approach. HUD provides technical drafting services to Congress on draft lead and healthy homes bills and reports when requested.