



## Agency Priority Goal Action Plan

# Protect Families from Lead-Based Paint and Other Health Hazards

### **Goal Leader:**

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

# Overview

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## Goal Statement

- By September 30, 2021, protect families from lead-based paint and other health hazards by making an additional 17,800 at-risk housing units healthy and lead-safe.

## 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 and, learning disabilities.

## 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 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.



**Michelle Miller**

Acting Director

Office of Lead Hazard Control and Healthy Homes

Note that Matthew Ammon, Director, Office of Lead Hazard Control and Healthy Homes, is currently Acting General Deputy Secretary for Community Planning and Development

# Goal Structure & Strategies

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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 – FY20 Q3

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In the third quarter of FY 2020, the OLHCHH's lead hazard control grantees made 458 older low-income housing units lead safe, and CPD's Community Development Block Grant and HOME programs made 1,505 older housing units lead safe in implementing HUD's Lead Safe Housing Rule. The lead hazard control grants' production is less than the second quarter production of 797 units, while the CDBG and HOME programs' production is greater than the second quarter production of 1,169 units. These numbers reflect that many lead hazard control grantees are health departments, largely focusing on the COVID-19 pandemic, while CDBG and HOME program participants have kept up a higher level of housing rehabilitation activity in spite of it.

Field and laboratory work was under way, if on a limited basis, in grants awarded under the OLHCHH's FY 2019 NOFAs, specifically, its 77 new state and local Lead Hazard Reduction grantees, six new tribal Healthy Homes Production Grant Program for Tribal Housing grantees, and 10 new universities and public health Technical Studies grantees.

The OLHCHH continued its grants streamlining effort within the Interagency Collaboration on Weatherization Eligibility seeking to harmonize and simplify income eligibility determinations for families and housing owners seeking assistance under multiple federal programs. The Office also continued implementing the Federal Action Plan to Reduce Childhood Lead Exposures and Associated Health Impacts issued by the President's Task Force on Environmental Health Risks and Safety Risks to Children.

# Effect of COVID-19 on HUD's Strategic Objective to Remove Lead-Based Paint Hazards and Other Health Risks from Homes

COVID-19, the respiratory illness caused by the severe acute respiratory syndrome coronavirus 2, has short- and mid-term effects on HUD's efforts to achieve its strategic objective to remove lead-based paint hazards and other health risks from homes.

## **Achieving outcomes in support of the objective:**

- HUD's long-term objective to remove these hazards from homes is unchanged.

## **HUD's current performance toward achieving this objective is hindered by:**

- Cautiousness among a majority of the public and business owners to participating in work activities requiring close staff and/or staff-client interaction, as is required for significant portions of hazard evaluation and control work on lead-based paint and other housing-related health and safety hazards; and
- Cautious Governmental stay-home requirements and/or recommendations.

## **As a result of this cautiousness, many:**

- State, local, and tribal government agencies, and community-based organizations are operating at reduced function;
- Contractors performing this work are operating at reduced function or not at all; and
- Housing owners/managers are reluctant about contractors entering.

## **OLHCHH plans to adapt moving forward by partnering with Program Offices to:**

- Provide technical guidance on balancing coronavirus safety and lead safety.
- Recognize COVID-19 program effects as reasonable bases for performance period extensions.

# Key Milestones

Leverage HUD's relationships with stakeholders across public and private sectors to maximize the impact of every dollar invested in lead, health, and safety activities.

Milestone Summary				
Key Milestone	Milestone Due Date	Milestone Status	Change from last quarter	Comments
Publish FY20 Lead Hazard Reduction NOFA.	6/30/2020	Complete	Yes	The NOFA was published on 7/23/2020; applications are due 8/24. Over a half-dozen national and regional outreach webinars are being held; they began on 8/5.
Develop, with CDC and other agencies, research agenda lead and other housing-related health and safety programs and interventions.	6/30/2020	Delayed	Yes	The relevant CDC and NIEHS offices are focusing on COVID-19, as are, to a lesser extent, the EPA offices, slowing progress. Using conference call and web video implementation meeting on implementing agencies' plans derived from 1Q interagency workshop, co-chaired by HUD, to identify research priorities to reduce childhood lead exposure.
Award FY2020 Lead Hazard Reduction Grants	9/30/2020	On Track	N/A	GMO approved a 32-day submittal period, down from the usual 45 days, to facilitate reaching the award milestone.

# Key Milestones

Align and enforce HUD-assisted housing inspections and mitigation measures to consistently address housing-related health and safety hazards across HUD-assisted housing programs.

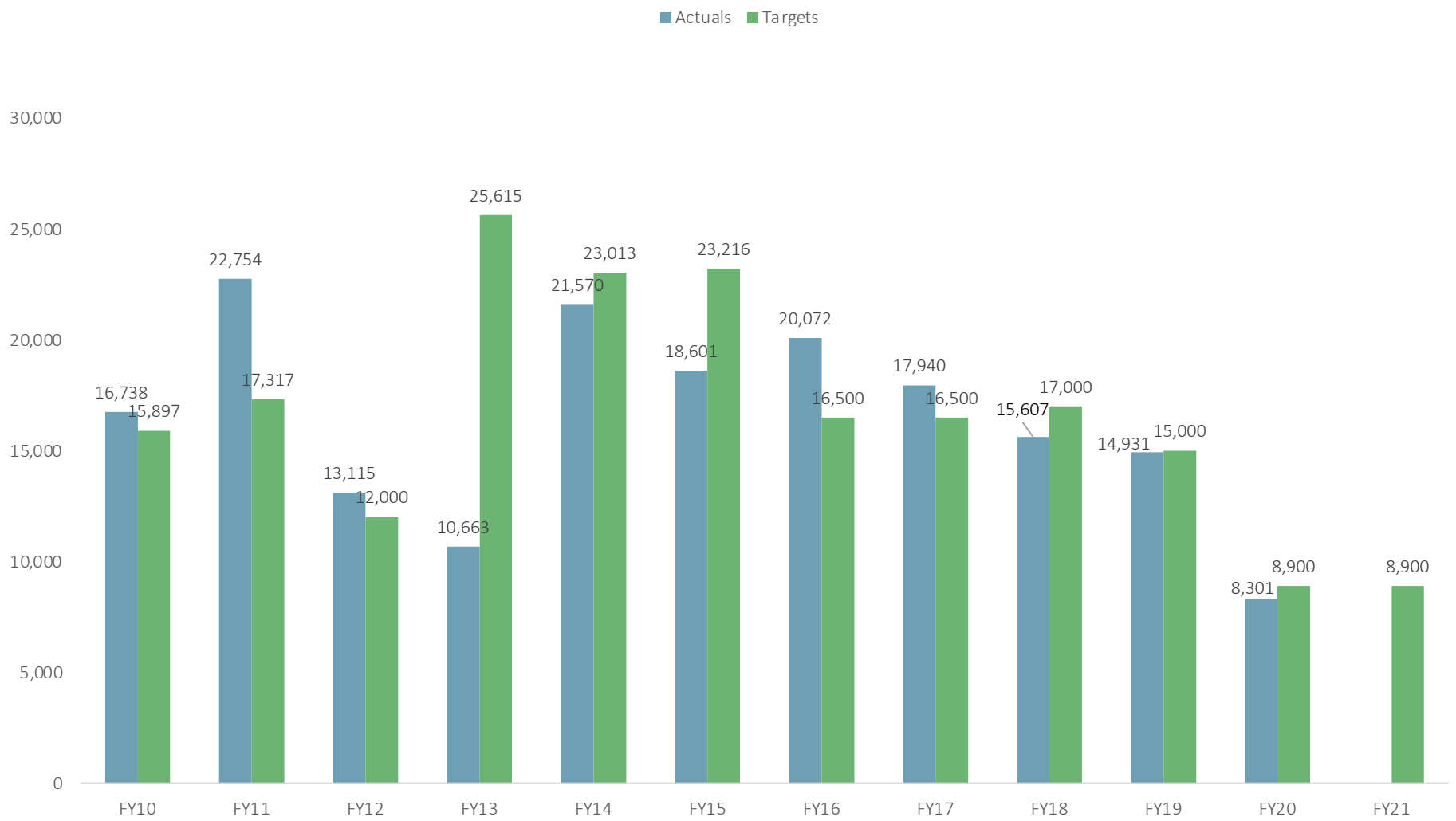
## Milestone Summary

Key Milestone	Milestone Due Date	Milestone Status	Change from last quarter	Comments
Draft data-sharing agreements with HHS and/or States for children with BLL $\geq$ 5 mcg/dL also receiving Medicaid or enrolled in Head Start/Early Head Start programs.	9/30/2020	Delayed	N/A	Privacy issues, including under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), remain substantial implementation obstacles; to help achieve the intended goal, HUD is working with states directly as well as with HHS. The relevant CDC offices are focusing on COVID-19, slowing progress.
Implement revised Lead Safe Housing Rule (LSHR) elevated blood lead level (EBLL) requirements.	9/30/2021	On Track	N/A	The target for issuing the proposed rule for public comment is revised to 12/31/2020, as per the Spring Semiannual Regulatory Agenda, adjusted per OMB direction re the COVID-19 pandemic.



# Key Indicator

Units Made Healthy, Physically Safe, and Lead-Safe with HUD Dollars, FY 2010-21 (incremental)



# Key Indicator (continued)

Units Made Healthy, Physically Safe, and Lead-Safe with HUD Dollars, FY 2010-21 (cumulative)



# Data Accuracy and Reliability

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

### Office of Lead Hazard Control and Healthy Homes

#### *Lead Hazard Control Grants*

- Description: Number of housing units made lead-safe through HUD's 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 healthy and lead-safe through HUD's 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 Lead Hazard Control and Healthy Homes programs (continued)

#### *Lead Hazard Enforcement*

- Description: Housing units made healthy and lead-safe through HUD's 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 and managers. They are then verified by EPA- or State-certified lead risk assessors. The 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.**

HUD 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 agencies to develop the Federal Lead Action Plan and implement it. HUD is also working 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. These 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 operates the telephone- and email-based Lead Regulations hotline servicing the public. HUD provides technical drafting services to Congress on draft lead and healthy homes bills and reports when requested.