Agency Priority Goal Action Plan

Protect Families From Lead-Based Paint and Other Health Hazards

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

Health
Overview

Goal Statement

- Protect families from lead-based paint and other health hazards by making an additional 23,500 at-risk housing units lead-safe by the end of FY 2019.

Challenge

- More than 23 million homes nationwide (52 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: Leadership teams will be finalized in the Spring. Updates will be provided subsequent to those decisions.
Childhood lead poisoning remains the most pervasive, yet preventable environmental health problem in the United States. Given that about 52% of occupied, privately owned housing built before 1978 contains lead-based paint, it is critical that communities, health departments, building owners, 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-safe and healthy housing investments, while also improving its data quality. Through data sharing between HUD, the CDC, and state and local governments, it is possible to identify neighborhoods with elevated risk for lead exposure, especially among children ages 0–5. 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.
Protect Families from Lead-Based Paint
and other health hazards by making an additional 23,500 at-risk housing units lead-safe by the end of FY 2019

**Metric**
Prevalence of children with elevated blood levels in high-risk communities and regions

**Milestone**
Publish FY 2018 Lead Hazard Control NCLA by 6/30/2018

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

**Milestone**
Complete GIS data-mapping by 9/30/2018

01
Increase community awareness to increase program participation

1.1
Host National Healthy Homes Conference

1.2
Leverage stakeholder relationships to maximize impact

1.3
Engage with partners around update of the Federal lead strategy

2.1
Improve data quality and access

2.2
Identify high-lead risk communities through data-mapping

02
Improve design and delivery of targeted Healthy Homes programs

Milestone
Host conference on 6/25/2018

Milestone
Update Interagency Federal Lead Strategy and communicate to stakeholders by 3/31/2019

Milestone
Draft data-sharing agreement with HHH by 9/30/2018
The Agency Strategic Plan and FY2019 Annual Performance Plan were both published in February. These documents lay out HUD’s strategies for protecting families from lead-based paint and other health hazards by making an additional 23,500 at-risk housing units healthy and lead-safe by the end of FY 2019. Our current data will be used as a baseline by which we measure progress towards this goal.

As of the first quarter of FY 2018, HUD has made 3,748 housing units lead-safe, including 1,688 units through its lead hazard control grants and 2,048 units through its Lead Safe Housing Rule compliance activities. This production represents 22 percent of the FY 2018 goal of making 17,000 housing units lead-safe and healthy.

Recently, HUD received approval from the Office of Management and Budget to proceed with the American Healthy Homes Survey (AHHS) II. AHHS II is an update of the AHHS that was completed in 2006. HUD’s primary objective for the survey is collect data on the prevalence of lead-based paint (LBP) and LBP hazards in a representative sample of U.S. housing; thus, allowing for the tracking of changes over time.

The field work for the AHHS II is expected to begin in late Spring, 2018.
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.

<table>
<thead>
<tr>
<th>Key Milestone</th>
<th>Milestone Due Date</th>
<th>Milestone Status</th>
<th>Change from last quarter</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Host National Healthy Homes Conference</td>
<td>6/30/18</td>
<td>On-track</td>
<td>N/A</td>
<td>Scheduled for Anaheim, CA with The National Environmental Health Association. HUD will use the conference to publicly launch this APG goal and build energy and commitment among stakeholders to set their own ambitious goals for FY 2018-2019.</td>
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<tr>
<td>Publish FY 2018 Lead Hazard Control NOFA</td>
<td>6/30/18</td>
<td>On-track</td>
<td>N/A</td>
<td>The NOFA has multiple areas in which stakeholder relationships are emphasized: These are a grant program mission goal, an expected activity under each grantee’s work plan, and part of the application rating factor for capacity and planned sustainability of program activities.</td>
</tr>
<tr>
<td>Update Interagency Federal Lead Strategy</td>
<td>3/31/19</td>
<td>On-track</td>
<td>N/A</td>
<td>HUD will ensure that the interagency strategy addresses ways to increase community awareness of housing-related health and safety hazards and participation in available programs and services.</td>
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</table>
**Key Milestones**

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

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<tr>
<td>Draft data-sharing agreement with HHS to identify children with blood lead levels (BLL) &gt;5 mcg/dL also receiving Medicaid or enrolled in Head Start/Early Head Start programs</td>
<td>9/30/2018</td>
<td>On-track</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Identify high lead-risk communities through data mapping</td>
<td>9/30/2018</td>
<td>On-track</td>
<td>N/A</td>
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Key Indicator #1

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

*The FY19 target does not include properties served with CDBG or HOME funds in accordance with the FY19 President's Budget proposals.*
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)

<table>
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<tr>
<th>Number of at-risk HUD housing units made healthy, physically safe and lead-safe</th>
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<tr>
<td><strong>Office of Healthy Homes and Lead Hazard Control programs (continued)</strong></td>
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<tr>
<td><strong>Lead Hazard Enforcement</strong></td>
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<tr>
<td>• Description: Housing units made lead-safe per agreements or orders under the Lead Disclosure Rule.</td>
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<tr>
<td>• Data source: Property owner/property manager reports</td>
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<tr>
<td>• Unit of measurement: Housing units</td>
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<tr>
<td>• Dimension: Count</td>
</tr>
<tr>
<td>• Calculation method: Total of units from each owner/manager</td>
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<tr>
<td>• Frequency: Quarterly</td>
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<tr>
<td>• Direction: Increase</td>
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<tr>
<td>• 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.</td>
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<tr>
<td>• 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.</td>
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| **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. |
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:


Other Federal Activities:

- HUD is working with EPA and HHS to develop the Federal Lead Strategy. HUD is also works with CDC on data sharing on elevated blood lead levels (EBLL) for children. 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.