



## 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

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## 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

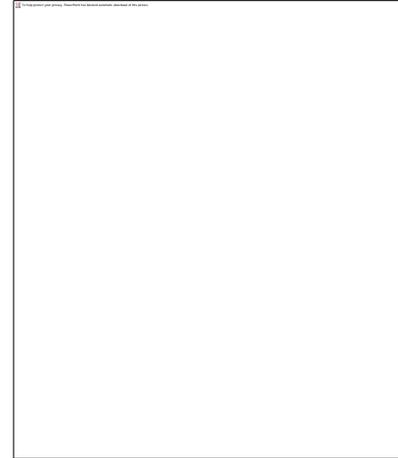
- HUD's Lead-Based Paint Hazard Control and Lead Hazard Reduction grants have a proven track record across the country of lowering the elevated blood lead levels of children and reducing incidents of future exposure. HUD has made nearly 400,000 homes lead-safe and is well-positioned to continue to make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

# Leadership

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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 (1 of 2)

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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 Centers for Disease Control and Prevention (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.

# Goal Structure & Strategies (2 of 2)

## 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



# Summary of Progress – FY 18 Q3

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As of the third quarter of FY 2018, HUD has made 11,861 housing units lead-safe, including 5,008 units through its lead hazard control grants and 6,853 units through its Lead Safe Housing Rule compliance activities. This production represents approximately 70% of the FY 2018 annual goal of making 17,000 housing units lead-safe and healthy. Based upon this and past performance trends, HUD is on track to meet its FY18 cumulative target to make 158,453 units lead safe since FY2010 using HUD dollars.

In June 2018, HUD launched the *Protect Our Kids!* campaign for National Healthy Homes month. This campaign aims to bring together HUD enforcement offices to collect and review documentation from HUD-affiliated properties to ensure compliance with the lead safety rules. This campaign aims to address violations of HUD's lead-based paint rules and regulations by providing assistance and enforcement actions against both private properties and HUD-assisted properties to ensure that more homes are lead hazard-free.

On June 19, 2018, HUD published the Lead-Based Paint Hazard Reduction Notice of Funding Availability (NOFA). Consistent with HUD's goal of leveraging partnerships to maximize the impact of its grants, this NOFA has multiple areas in which stakeholder relationships are emphasized. For instance, it includes a data sharing agreement with Health and Human Services (HHS) to identify children with blood lead levels (BLL) >5 mcg/dL who are also receiving Medicaid or are enrolled in Head Start/Early Head Start programs. Identifying these children will enable HUD and its stakeholders to target at-risk communities and leverage federal funding to mitigate lead-based hazards and measure progress towards lead hazard reductions.

# 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	Yes	Held on June 25-28 in Anaheim, CA with the National Environmental Health Association. HUD used 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.
Publish FY 2018 Lead-Based Paint Hazard Reduction NOFA	6/30/18	Complete	Yes	Published June 19, the NOFA has multiple areas in which community awareness and stakeholder relationships are emphasized. These are: 1) a grant program mission goal; 2) an expected activity under each grantee’s work plan; and 3) part of the application rating factor for capacity and planned sustainability of program activities.
Update Interagency Federal Lead Strategy	3/31/19	On-track	N/A	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.

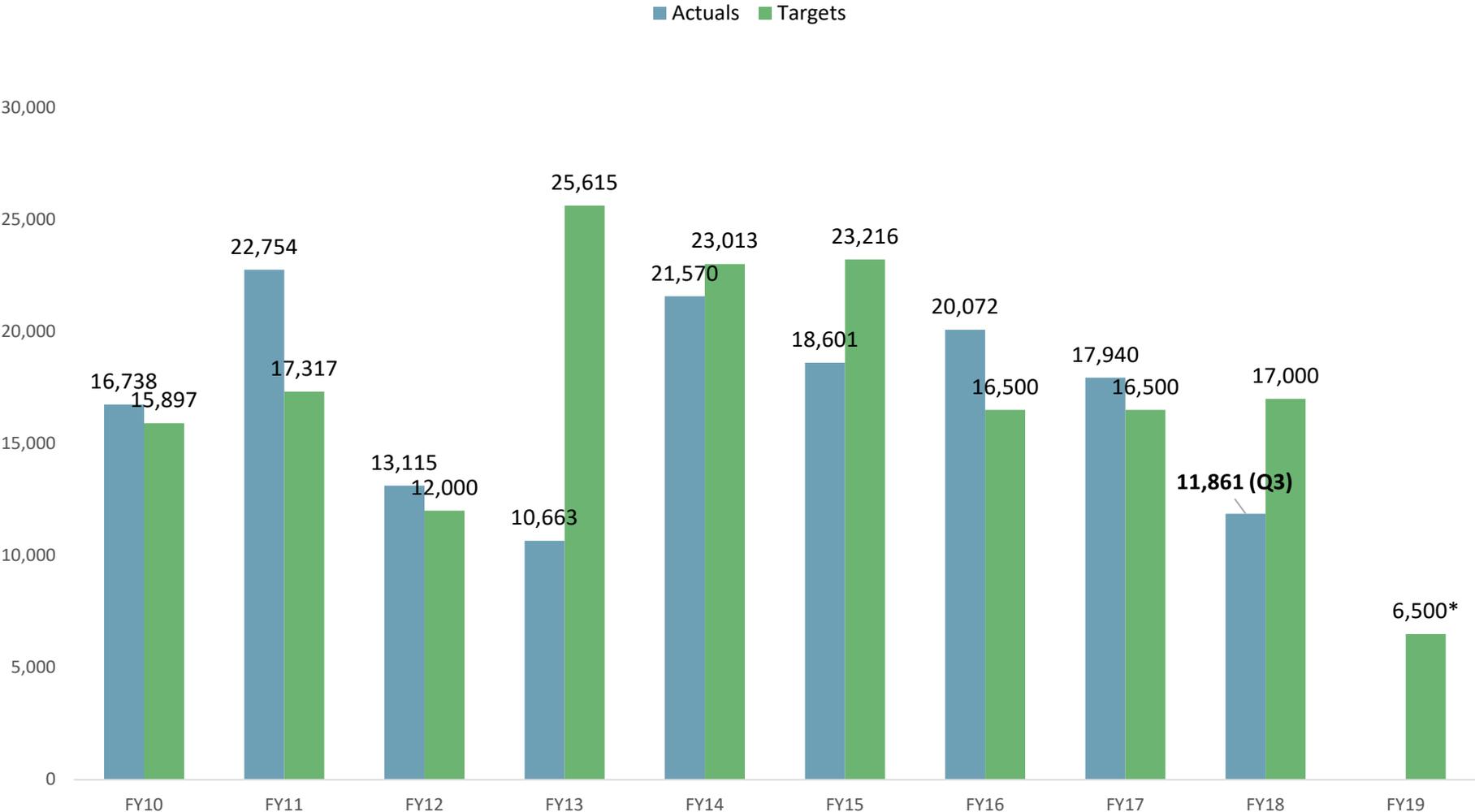
# Key Milestones

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	None	In the FY 2018 Lead-Based Paint Hazard Reduction NOFA, HUD considered 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/CMMS on encouraging state participation in this effort.
Identify high lead-risk communities through data mapping	9/30/2018	Complete	N/A	HUD has identified factors associated with high lead-risk communities, has used them to map such communities, and is using the data mapping in the FY 2018 Lead-Based Paint Hazard Reduction NOFA as part of rating applications.
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	On Track	None	Launch Elevated Blood Lead Level (EBLL) Tracking Portal for PHAs and other owners to report EBLL cases in assisted housing online, as required by the EBLL amendment to HUD’s Lead- Safe Housing Rule.

# Key Indicator #1

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

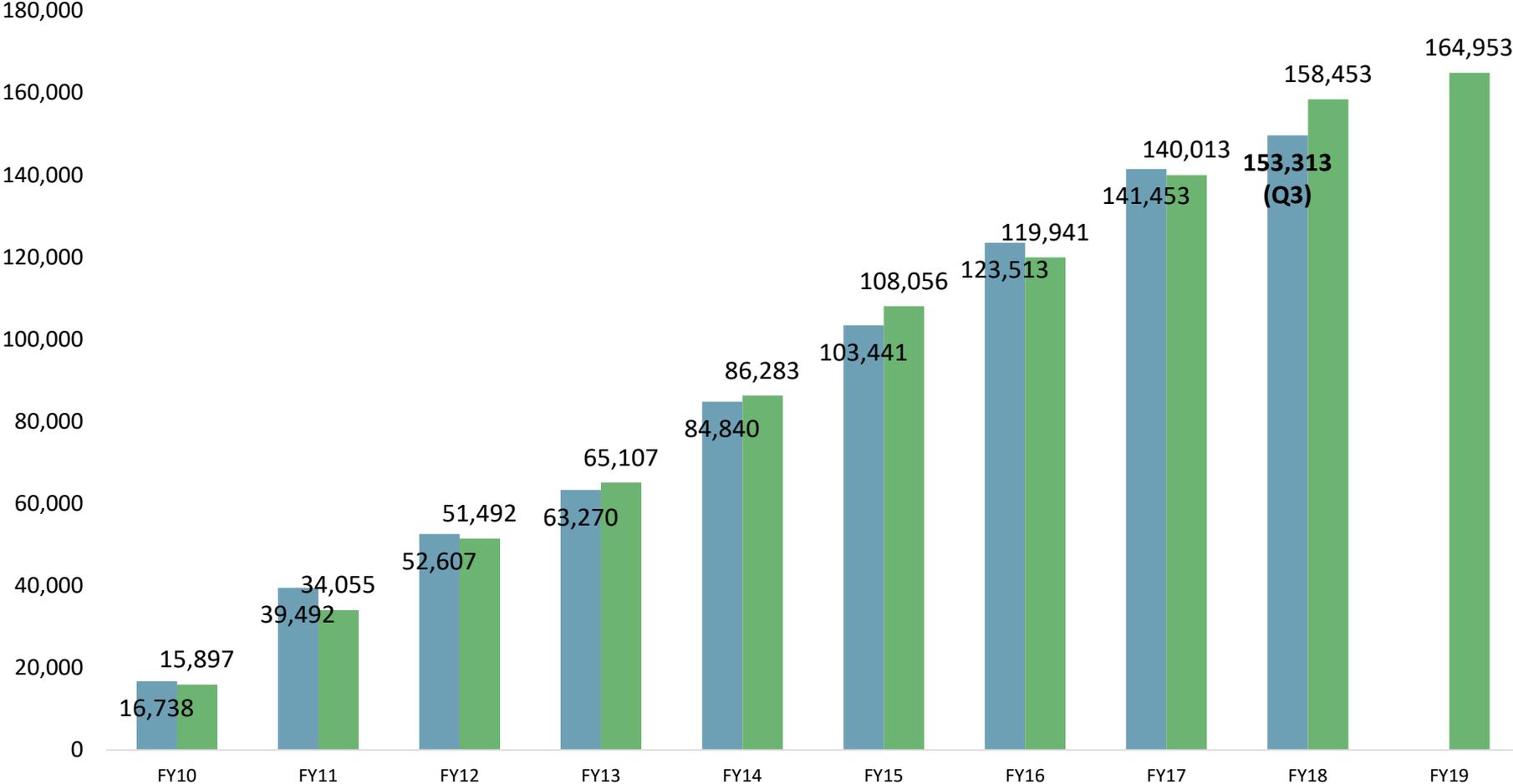


\*The FY19 target does not include properties served with CDBG or HOME funds in accordance with the FY19 President's Budget proposals.

# 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 Lead Hazard Control and Healthy Homes 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 (Line of Credit Control System (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 (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.

# 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 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 Environmental Protection Agency (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

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## 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 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.