

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

PERSONNEL COMPENSATION AND BENEFITS

LEAD-HAZARD REDUCTION

SCOPE OF ACTIVITY

The Office of Healthy Homes and Lead Hazard Control (OHHHLC) has primary responsibility for the lead-based paint and healthy homes activities of the Department and is directly responsible for the administration of the Lead-Based Paint Hazard Reduction program authorized by Title X of the Housing and Community Development Act of 1992. The OHHHLC's work contributes directly to fulfilling HUD's Strategic Goal C: Strengthen Communities, specifically, Strategic Objective C.5, Address housing conditions that threaten health, and the Annual Performance Plan goals established for the Office under that Strategic Objective.

The Office develops lead-based paint regulations, guidelines, and policies applicable to HUD programs, designs lead-based paint and healthy homes training programs, administers lead-hazard control and healthy homes grant programs, and implements the lead and healthy homes research program. The Office enforces the Lead Disclosure Rule on disclosing known information on lead-based paint and its hazards before sale or lease of pre-1978 housing, and, in cooperation with HUD Program offices, enforces the Lead Safe Housing Rule covering pre-1978 HUD-assisted and HUD-owned housing. Additionally, the Office administers an ongoing program of education and information dissemination on lead-based paint and healthy homes issues and serves as the Department's central information source for the Secretary, the Congress, and the public on these topics.

For the Healthy Homes Initiative, the Office develops and implements a program of research, demonstration, training and public education projects that address multiple housing-related hazards affecting the health of residents, particularly children. The Office also has responsibility for providing technical support to HUD staff, HUD grantees, and State and local governments which provide the public with lead-based paint technical and program information.

Staff:

- Manage and evaluate multi-year lead hazard control and healthy homes grants awarded to State and local governments and private-sector organizations;
- Enforce the Lead Disclosure Rule and the Lead Safe Housing Rule to ensure compliance, prevent childhood lead poisoning, and produce lead-safe units (in cooperation with the Environmental Protection Agency, the Centers for Disease Control and Prevention, HUD's Program Offices and HUD's Office of General Counsel);
- Develop and fund demonstration projects and research to evaluate the effectiveness of housing interventions and public awareness campaigns under the Healthy Homes Initiative;
- Provide consumer information, education and outreach on residential hazards, including lead-based paint hazards, allergens (allergy-inducing substances), mold, residential pesticides, etc., in the nation's housing;
- Collaborate with other Federal agencies having a complementary role in lead-hazard reduction and healthy homes programs;
- Respond to all Congressional and other public inquiries relating to lead-based paint and healthy homes activities of the Department;
- Assist HUD programs in conducting lead inspections/risk assessments in federally assisted housing, providing information and guidance on lead and healthy homes issues to stakeholders and the public, and tracking efforts that make housing units lead-safe;

Personnel Compensation and Benefits--Lead-Hazard Reduction

- Provide technical assistance to HUD grantee program participants; and
- Develop and distribute training materials to State and local governments, grantees, health and housing organizations, and housing owners and managers.

The OHHLHC staff is responsible for monitoring a total of approximately 260 multi-year grants/cooperative agreements funded in the Lead Hazard Control Grant Program, the Lead Hazard Reduction Demonstration Program, Lead Technical Studies, Lead Outreach, and the Healthy Homes Initiative, and approximately 40 contract actions in support of these programs. As part of these monitoring activities, staff review and score approximately 220 grant applications and at least fifteen major contract actions annually. Coupled with expanding aggressive enforcement of the Lead Disclosure Rule and Lead Safe Housing Rule, the workload is anticipated to continually increase in the next few years. HUD is increasing its enforcement staff as this work contributes directly to the number of units made lead-safe and the President's goal of eliminating childhood lead poisoning as a major public health problem by 2010, which is just 2 years after the start of fiscal year 2009. Implementation of these activities will be accompanied by a need for widespread technical assistance, interpretation, training and outreach.

As of September 2007, through the OHHLHC's efforts, over 96,400 homes had been made lead-safe under the OHHLHC's grant programs. Settlement agreements were reached to make over 185,000 homes lead safe through regulatory enforcement, as documented by grantees' lead clearance reports, and landlords' regulatory enforcement agreements. For healthy homes, since the start of fiscal year 2006, over 1,296 homes have had allergen levels reduced as a result of intervention using healthy homes principles, as documented by healthy homes grants' construction records. The increase in the request for salaries and expenses is based on the need to meet the OHHLHC's 2011 Strategic Goals (and the corresponding 2009 Annual Performance Plan goals) for lead and healthy homes that require increases in the number of housing units made lead safe through grant and regulatory activities, and increases in the number of homes in which allergen levels have been reduced through activities using healthy homes principles. Without the increased funding, grant monitoring and regulatory enforcement activities will remain at current levels, which will be inadequate to reach the 2011 Strategic Goals and the corresponding 2009 Annual Performance Plan goals.

In fiscal year 2009, the Office will increase its program staff, mostly out-stationed at HUD Field Offices, in order to provide greater service to HUD staff and external stakeholders, an increase in compliance monitoring of grantees, and the additional investigative expenses and travel associated with enforcement of HUD's lead regulations. With the increase, OHHLHC staff will expand their healthy homes research, demonstration and policy development efforts, and perform increased on-site compliance monitoring of all high-risk and pre-high risk grantees, and assist new grantees with program start-up. By visiting new grantees in fiscal year 2009, HUD will assist during the critical program development phase and prevent grant management problems that may develop later.

Travel funds for enforcement of HUD regulations will cover costs associated with investigations including on-site file reviews of tenant records, and monitoring of lead-hazard control work performed under settlement agreements, as well as costs associated with administrative hearings, depositions, and subpoena enforcement. Travel and publication funds will support regulatory enforcement efforts to achieve the 2010 childhood lead poisoning goal, and HUD's Strategic Goal C: Strengthen Communities. In particular, the staff trips reduce the number of poor-performing grantees and thereby increase the number of homes made safe under the grants; they increase the number of lead regulatory settlements and thereby increase the number of homes made lead-safe under settlement agreements.

Out-stationed OHHLHC staff (including those additional staff to be stationed in Regions where there is currently no OHHLHC presence) will travel to locations within their respective regional jurisdictions (and sometimes outside of their region) to help HUD Field Offices comply with lead regulatory requirements in their grant monitoring activities, monitor grants, provide technical assistance, and assist in the enforcement of the Lead Safe Housing and Lead Disclosure Rules. The staff will contribute to program development and capacity building functions by researching and sharing information about successful healthy homes and lead hazard control approaches at various professional conferences and seminars. Further, out-stationed staff will serve as Government Technical Representatives (GTRs) on grants and Government Technical Monitors (GTM) on contracts. For Lead Disclosure Rule enforcement, out-stationed staff will perform on-site landlord file reviews of disclosure documents and monitor compliance with settlement agreements.

HUD requests an increase in training funds to close skill gaps in critical employees, to acquire information on newly evolving critical issues in the healthy homes subject area (regarding identifying and addressing multiple residential safety and health issues, green building issues and sustainable construction issues), and to plan for staff retirements. As part of succession planning, the OHHLHC

Personnel Compensation and Benefits--Lead-Hazard Reduction

will ensure that junior employees are equipped with the knowledge and skills necessary to fill mission-critical vacancies when senior employees retire.

Personnel Compensation and Benefits--Lead-Hazard Reduction

OHHLHC's research and program support activities generate a significant number and variety of documents that are of value to HUD staff, grantees, jurisdictions, property owners, non-profit organizations and other private stakeholders. In fiscal year 2009, the OHHLHC's will increase its production of printed materials to promote compliance with HUD regulations and conformance with HUD guidance by HUD stakeholders and the general public. Additional printed materials will improve cooperation among HUD Headquarters and Program Office staffs, especially regarding the 2010 lead target. These materials include printed documents and electronic materials distributed via CDs, DVDs, etc., in order to provide stakeholders with ready access to the information and heightened impression for larger-sized outreach materials. This effort will be complemented by continued staff effort to enhance the OHHLHC's website and cooperate with other HUD offices in improving their websites.

OFFICE OF HEALTHY HOMES AND LEAD HAZARD CONTROL

**Personal Services
Summary of Change
(Dollars in Thousands)**

	Actual <u>2007</u>	Enacted <u>2008</u>	Request <u>2009</u>	Increase + Decrease - <u>2009 vs. 2008</u>
FTE.....	49	50	54	+4
Personal Services.....	\$5,597	\$6,980	\$7,815	+\$835

OFFICE OF HEALTHY HOMES AND LEAD HAZARD CONTROL
Summary of Requirements by Grade
Salaries and Expenses

<u>Grade:</u>	<u>2007</u> <u>Actual</u>	<u>2008</u> <u>Enacted</u>	<u>2009</u> <u>Request</u>	<u>Increase +</u> <u>Decrease -</u>
Executive Level IV	0	0	0	0
Executive Service	+1	+1	+1	0
GS-15	+7	+7	+7	0
GS-14	+15	+16	+16	0
GS-13	+14	+14	+14	0
GS-12	+4	+2	+2	0
GS-11	+3	+2	+9	+7
GS-10	0	0	0	0
GS-9	+2	+5	+2	-3
GS-8	+1	+1	+1	0
GS-7	+1	+1	+2	1
GS-6	0	+1	0	-1
GS-5	+1	0	0	0
GS-4	0	0	0	0
GS-3	0	0	0	0
GS-2	0	0	0	0
GS-1	0	0	0	0
Total Positions	+49	+50	+54	+4
Average ES Salary	160,615	160,615	\$160,615	0
Average GS Salary	\$80,810	\$82,749	\$84,735	+\$1,986
Average GS Grade	12.2	12.1	12.0	0.1

Personnel Compensation and Benefits--Lead-Hazard Reduction

EXPLANATION OF CHANGES FROM 2008 BUDGET ESTIMATE TO 2009 BUDGET REQUEST

The Office of Healthy Homes and Lead Hazard Control (OHHLHC) FTE level of 54 FTE for fiscal year 2009 is an increase of 4 FTE from fiscal year 2008. The additional 4 FTE will be used in the field to complete regional coverage (presently, only five regions have OHHLHC representation):

- Provide support and monitoring for field program offices (CPD, PIH, and Housing) in implementing the Lead Safe Housing Rule (covering lead safety in assisted pre-1978 housing), by:
 - assisting in the development of concise lead Management Plan goals for Program Offices and their Field Offices, along with helping develop local implementation plans for these goals;
 - providing training to Field Offices and assisted rental property owners on the requirements of the Lead Safe Housing Rule, including, documentation and monitoring requirements; and
 - helping Field Offices implement systems to ensure proper tracking and monitoring of housing units made lead-safe in accordance with the Lead Safe Housing Rule.
- Increase enforcement of the Lead Safe Housing Rule and the Lead Disclosure Rule (covering disclosure of known lead-based paint and its hazards when renting or leasing pre-1978 housing), by:
 - providing training to Field Offices on Lead Safe Housing Rule enforcement procedures;
 - serving as liaison with local Health Departments in order to better target enforcement efforts by obtaining lead poisoning case information; and
 - following up enforcement cases to ensure remediation and enforcement actions are considered and implemented.
- Provide technical assistance to OHHLHC grantees, housing industry professionals, and the general public on healthy homes and lead safety issues, by:
 - identifying performance obstacles and their causes, and recommending solutions, particularly for healthy homes activities, where, because the principles of practice are being developed and are not yet standardized, considerable amounts of professional experience and knowledgeable judgment are required;
 - identifying best practices of other grantees and industry professionals; and
 - providing training and direct support on healthy homes principles and lead safety evaluation and control practices.

The attached charts display detailed staffing and workload estimates based on the Resource Estimation and Allocation Process (REAP) baseline data.

Overall Summary of Office of Healthy Homes and Lead Hazard Control Staff Requirements

	Actual 2007	Enacted 2008	Request 2009	Increase + Decrease - 2009 vs 2008
Headquarters.....	48.9	50.0	54.0	+4.0
Total	48.9	50.0	54.0	+4.0

Summary of Office of Healthy Homes and Lead Hazard Control Staff Requirements

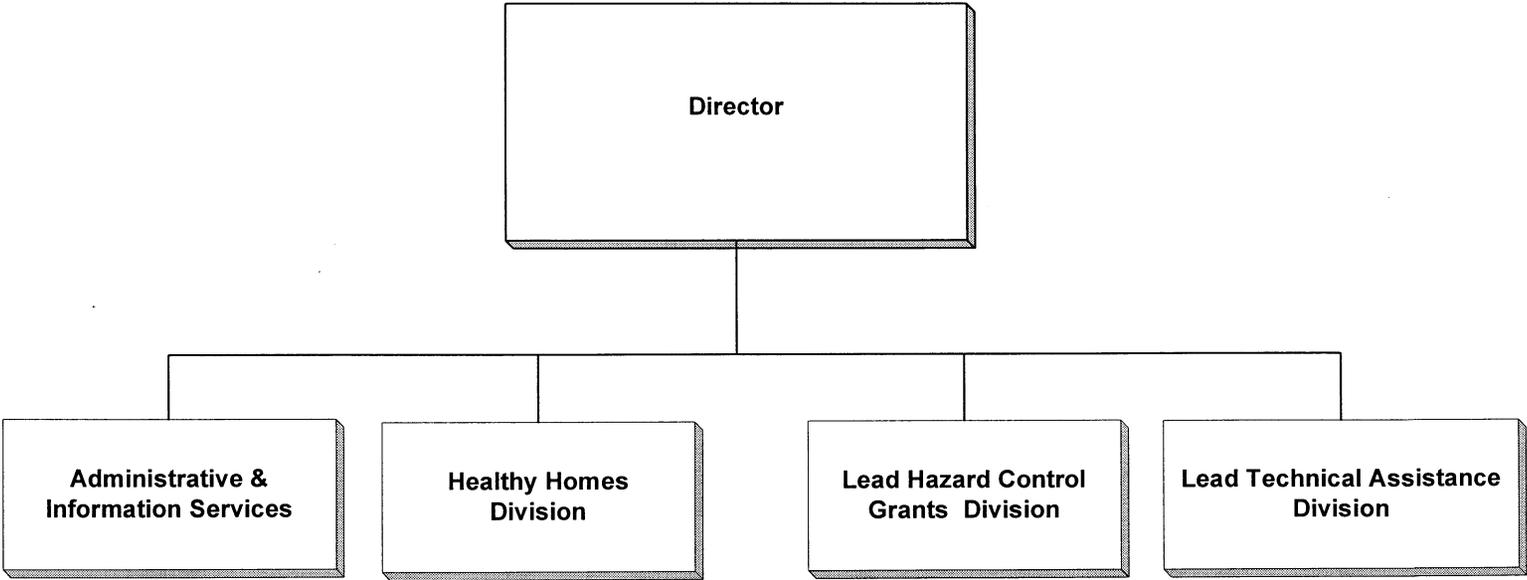
	Actual 2007	Enacted 2008	Request 2009	Increase + Decrease - 2009 vs 2008
<u>Headquarter Employment</u>				
Immediate Office of the Director	3.0	3.9	3.9	0.0
Compliance Assistance and Enforcement Division	10.0	10.0	10.0	0.0
Budget and Administrative Services Division	8.0	9.3	9.4	+0.1
Healthy Homes Division	12.2	12.2	16.2	+4.0
Program Management and Assurance Division	15.7	14.6	14.5	-0.1
Total	48.9	50.0	54.0	+4.0

Detail of Office of Healthy Homes and Lead Hazard Control Staff Requirements

Workload Guideline	Workload Indicator	Fiscal Year 2007			Fiscal Year 2008			Fiscal Year 2009				
		Projected Accomplish- ment	Projected Unit Cost (Hrs)	FTE	Underfunded Workload/ Allocation	Projected Accomplish- ment	Projected Unit Cost (Hrs)	FTE	Underfunded Workload/ Allocation	Projected Accomplish- ment	Projected Unit Cost (Hrs)	FTE
Headquarters Employment												
Immediate Office of the Director												
Provide Management Oversight and Policy Guidance	NA	3.0		3.9		3.9
Subtotal				3.0				3.9				3.9
Compliance Assistance and Enforcement Division												
Manager Section 1018 Enforcement	Number of enforcement cases completed	174	120.00	10.0		174	120.00	10.0		174	120.00	10.0
Subtotal				10.0				10.0				10.0
Budget and Administrative Services Division												
Manage Grant Obligation and Funding	Number of Active Grants	265	34.00	4.3		272	45.00	5.8		272	45.00	5.9
Perform Admin. & Info.Svs. Function	Number of Encumbered Personnel	55	139.20	3.7		53	139.20	3.5		53	139.20	3.5
Subtotal				8.0				9.3				9.4
Healthy Homes Division												
Perform Grant Compliance Monitoring	# of Grants Monitored	272	85.00	11.1		272	94.00	12.2		272	124.00	16.2
Develop Program Policy for Healthy Homes Initiative	NA	1.1	
Subtotal				12.2				12.2				16.2
Program Management and Assurance Division												
Develop Program Policy for Office of Healthy Homes and Lead Hazard Control	NA
Manage Active Grants/Cooperative Agreements	Number of Active Grants/Cooperative Agreements
Provide Grant Management	# of Grants Managed	272	94.00	12.3		272	94.00	12.2		272	94.00	12.2
Lead-based paint Evaluations	Number of Lead-based Paint Evaluations completed	700	2.9	1.0	
Perform Policy and Regulatory Development and Technical Support	# of Projects	10	501.41	2.4		10	501.41	2.4		10	490.00	2.3
Subtotal				15.7				14.6				14.5
Total				48.9				50.0				54.0



OFFICE OF HEALTHY HOMES AND LEAD HAZARD CONTROL



February 4, 2008