U. S. Department of Housing and Urban Development
Washington, D.C. 20410

OFFICE OF LEAD HAZARD CONTROL

POLICY GUIDANCE NUMBER: 94-01	DATE: January 26, 1994
SUBJECT:	Data Collection and Reporting Requirements for Round Two Grantees
STATUS:	Archived
APPLICABILITY:	Grant rounds Two and Three.
RELATED GUIDANCES:	Policy guidance 97-03.
COMMENTS:	Superseded by policy guidance 97-03. This guidance letter will be archived and no longer referenced.

Dear Lead-Based Paint Hazard Control Grantee:

I am writing this letter to describe data collection and reporting requirements for grantees participating in Round Two of the Lead-Based Paint Hazard Reduction Grant Program (these are the grantees who were announced on December 23, 1993).

As you may be aware, all ten grantees in Round One are participants in a national evaluation to determine the effectiveness of various lead-based paint interventions. The evaluation is being carried out on behalf of HUD by the National Center for Lead-Safe Housing. This is an important, large and rigorous undertaking that is designed to yield much valuable information that will be useful to everyone engaged in lead hazard control. Data collection requirements are substantial, however, and costly. Because or the high cost, and because it is not necessary to include all Round Two jurisdictions to get statistically valid findings, HUD plans to seek the voluntary participation of only two or three Round Two grantees in the full national evaluation. They will be selected primarily because the type of housing they are planning to treat is not well represented in the programs of the Round One grantees.

For most of you, therefore, HUD's data collection and reporting requirements will be considerably less than for those involved in the full

evaluation. The minimum requirements are described in general terms below. Additional detail, including forms, special data collection instructions and reporting procedures, will be provided at a later date. Grantees who have proposed to collect additional information, beyond the minimum requirements, may use HUD grant funds for that purpose. Please use this guidance in preparing your final grant budgets.

The following information must be reported to HUD for each treated housing unit. If two or more units in a multi-unit structure are treated, they can probably be reported as a group, although the details on that have not been worked out. The primary purpose of these requirements to permit HUD to report to the Congress what is being done under this program .

1. Dwelling Unit and Household Description

- Identification number for unit or building
- City
- Year of construction
- Number of units in structure
- If multi-unit structure, number of units treated
- Tenancy prior to intervention (i.e. resident owns or rents)
- Occupancy data prior to intervention
  -- Total number of people
  -- Number of children under 6 years of age

2. Summary of Hazard Evaluation

Depending upon the type of intervention contemplated, either a risk assessment, a paint inspection, or a combination of the two must be conducted and the results summarized and reported. The choice of evaluation method is up to the grantee, but HUD expects that the grantee will choose the type of hazard evaluation that will make the hazard control effort most cost-effective. HUD considers risk assessment the appropriate evaluation method if the control strategy consists of interim controls (primarily dust lead reduction and paint stabilization). If the controls involve abatement (enclosure, removal or replacement) or if there will be significant concurrent rehabilitation, a paint inspection is required. Evaluations must be conducted in accordance with procedures described in the new HUD Guidelines, which are scheduled for publication in August 1994. A prepublication draft of the Guidelines will be made available in March 1944 to all grantees.

The purpose of this reporting requirement is to permit HUD to report to the Congress: (1) what types of evaluation activities are being done under the program, and (2) in summary, what the findings are with regard to level of lead contamination (e.g., distribution of treated units by dust lead levels, in the case of risk assessments; or distribution units by maximum concentration of lead in paint, in the case of inspections.

3. Blood Lead

Grantees must attempt to obtain and report to HUD the blood lead levels of children under 6 years of age who are residing in dwellings to be treated. Such blood lead samples should be sampled and analyzed within 3 months prior to intervention. HUD recommence that all young children living in older housing be tested according to recommendations of the Centers for Disease Control and Prevention.

Having these data will permit HUD to describe the distribution of treated homes in the program by blood lead levels of resident children. Please note that (1) HUD acknowledges that parents can not be required to submit their children to blood sampling, and (2) these data will be confidential. HUD is not requesting information on street address, and if there are two or more children under 6 in a unit, it will not necessary to match age and blood lead data.

It is very important that grantees know, prior to environmental intervention, whether resident children have elevated blood lead (EBL) levels. Special actions are called for in EBL cases, including medical case management and an inspection of potential sources of exposure that is more thorough than that normally conducted under primary prevention programs.

4. Type of Hazard Control Strategy

HUD will provide instructions on how to categorize the type of environmental intervention strategy utilized. A simple typology is planned. The extent of planned monitoring and reevaluation will be included as part of the data requirement.

5. Costs

Costs must be reported by the following activities for each unit or building:

- evaluation (i.e., risk assessment or inspection, or combination)
- initial hazard control actions (e.g. interim controls or abatement, including relocation, site preparation, clearance examination, recleaning if initial clearance test fails, waste handling, etc.).
- evaluation or control activities conducted after initial controls and clearance (e.g. monitoring, reevaluation, recleaning, etc.)

This requirement is over and above other routine financial reporting required for the HUD Lead-Based Paint Hazard Reduction Grant Program. It will permit HUD

to report what these lead-based paint hazard evaluation and control activities are costing.

Please note that under this program no unit may be fully re-occupied until clearance has been achieved in accordance with the new HUD Guidelines. Grantees must certify to HUD that this requirement has been or will be enforced. HUD will not require all grantees to report data on clearance results.

6. Post-Intervention Reevaluation

All grantees must conduct and report the results of a reevaluation involving a visual inspection of paint condition and a sampling and analysis of dust in all treated units 12 months after completion of clearance. HUD considers it essential that grantees check at least once on the success of their hazard control activities in controlling immediate lead hazards.

Grantees may desire to collect further information in addition to the requirements described above. If so, grantees may utilize HUD grant funds for this purpose. However, grantees who wish to collect data in a manner consistent with the national evaluation must engage the National Center for Lead-Safe Housing and pay for the training and technical assistance from its own grant or other resources. A copy of the overall design and data collection protocols and forms for the national evaluation will be sent to all Round Two grantees for your information. You should receive this during the middle of February 1994.

Please use the above guidance in preparing your final grant budgets for negotiations. For those who opt to collect the minimal level of data, the amount devoted to data collection will probably be substantially less than the required 3 percent set-aside. Those who choose to be more ambitious should make appropriate budget adjustments, if necessary.

Sincerely,

Ellis G. Goldman
Director, Program Management Division