

# **Sample Framework for Developing a State or Local Lead Poisoning Primary Prevention Strategy**

## **I. Introduction**

The goals of a Lead Poisoning Primary Prevention Strategy (PPS) are to define the problem at a State or local level, identify available federal and local resources to build capacity, and agree on a coordinated set of actions create housing that is lead safe. To accomplish these goals, OHHLHC recommends a framework and process that addresses the following objectives:

- Create an PPS initiative within a jurisdiction by convening a local planning meeting and identifying an ongoing process that will result in lead-safe housing;
- Achieve adoption of the process by officials and stakeholders who will implement it;
- Commit available federal, state and local resources to control lead hazards in federally-assisted and unassisted properties, in this order:
  - properties that are responsible for multiple lead poisonings,
  - properties that are responsible for a single lead poisoning or elevated blood lead levels, and
  - properties identified with lead hazards;
- Control lead hazards in these properties and perform clearance examinations; and
- Use a reporting system to track the identities of properties where lead hazards have been controlled and clearance has been achieved.

## **II. Overview**

This document describes a sample framework that can be used by communities and States across the country to develop a PPS.

This sample framework addresses:

- defining the problem within the jurisdiction;
- identifying and involving federal entities and key stakeholders;
- identifying roles of each partner;
- identifying federally-assisted and unassisted properties, and the characteristics of these properties that are responsible for multiple lead poisonings, single lead poisonings, and contain lead hazards;
- identifying ways to reduce the lead hazards in these properties (both federally-assisted and unassisted);
- implementing the lead hazard control activities;
- tracking properties that have been cleared;
- meeting on a regular basis to discuss properties that have been cleared, properties that require lead hazard control activities, and other health issues associated with housing in the jurisdiction;
- monitoring for compliance with the Lead Safe Housing Rule and the Lead Disclosure Rule; and
- forwarding a list of non-compliant property owners to the HUD's Office of Healthy Homes and Lead Hazard Control's (OHHLHC's) Compliance Assistance and Enforcement Division (CAED).

Through a collaborative approach, such as the one used in this sample framework, States and communities can establish an effective local Primary Prevention Strategy that will protect families, particularly children, from exposure to lead hazards, and can be expanded to other housing-related health hazards.

This sample framework for developing a PPS is intended solely as an informational resource. Grantees and their jurisdictions are not required to use this approach or the steps described to develop a PPS. Jurisdictions are free to adapt or refine this framework to address their local circumstances, or use their own locally developed process and steps.

### **III. Description of Method and Key Steps**

This framework relies on a process led by one or more primary local agencies from the jurisdiction. This framework assumes that federal agencies play a supporting role. In communities facing a significant lead poisoning problem (or other housing-related health hazards) affecting a substantial number of properties receiving federal financial assistance or where significant violations of federal law have occurred, federal agencies would likely play a larger role. However, the leadership would still rest with local agencies.

At the federal level, HUD's Office of Healthy Homes and Lead Hazard Control (OHHLHC) can offer assistance from its regional staff to help in coordinating and communicating with the local HUD Field Offices, federal partners and, community organizations. The local HUD Field Office can assist in defining the problem relative to housing, e.g., pre-1978 properties with lead hazards and housing characteristics. CDC and local health departments may be able to provide medical surveillance data and identify the properties responsible for lead poisonings. EPA can address education/outreach, capacity building and compliance assistance for the Lead Disclosure Rule.

OHHLHC recommends that the primary local agencies establish a Local Primary Prevention Strategy (PPS) Working Group. This PPS Working Group would consist of representatives of key local stakeholders, and federal agencies as feasible and appropriate. Under this framework, OHHLHC recommends that the PPS Working Group follow the six key steps outlined below to identify and address the lead poisoning problem within a specific jurisdiction:

#### Step 1: Compiling Background Information for the Meeting

- The primary local agencies for the PPS (e.g., local housing agency and health department), in collaboration with OHHLHC and CDC, should develop a profile of the local jurisdiction by compiling a list of addresses of properties that are responsible for lead poisonings (multiple poisonings and single poisonings) and defining the housing characteristics of these properties, i.e., owner-occupied, rental housing, and public housing units.
- OHHLHC can share this information with the HUD Field Office Director. The Field Office Director, in collaboration with local Program Office Directors, can then compile a list of federally-assisted, pre-1978 properties with lead hazards, and provide this list to OHHLHC and the primary local agencies.

### Step 2: Planning the Meeting

- OHHLHC encourages the primary local agencies to seek help from OHHLHC in developing a tentative agenda and then set up a teleconference with the HUD Field Office Director, CDC, EPA and other key local partners to discuss this tentative agenda.
- The primary local agencies should contact the city/county governmental officials and local stakeholders explaining the nature of the meeting and requesting their attendance.
- OHHLHC can contact the local HUD Field Office Director who, in turn, can contact the local HUD Program Office Directors. HUD Program Office Directors (Directors of Public and Indian Housing, Community Planning and Development and Multifamily Housing), can help identify local stakeholders, such as the NAHRO and NAHMA, Regional HOC, Public Housing Authority Officials, local housing partnership organizations, and local governmental officials (including elected officials, code enforcement officials and community development officers) and discuss the importance of meeting to develop a local strategy.
- The primary local agency can then request from OHHLHC, the HUD Field Office Director, CDC, EPA and the Health Department a list of additional names of candidate attendees. The primary local agencies can then contact these other local stakeholders.
- EPA can contact respective Lead Program Coordinators and request their attendance.
- CDC can contact respective Regional Project Officers for the Childhood Lead Poisoning Prevention Program (CLPPP) and request their attendance.
- If elected officials will be attending, OHHLHC will inform the HUD Office of Congressional and Intergovernmental Relations and Supervisory Field Liaison Officer.
- The primary local agencies will finalize the agenda (including attendees and roles during the meeting) based on comments from the teleconference and feedback received when inviting meeting participants.
- The primary local agencies will then send the final agenda to all participants before the meeting.

### Step 3: Convening the Planning Meeting

- The primary local agencies should chair the meeting.
- The primary local agencies should present background information about the Local PPS initiative and the agenda.
- The primary local agencies should introduce their federal partners.
- The HUD Field Office Director can introduce HUD staff attending.
- The local Health Department should define the lead poisoning problem in the community and provide statistics relative to demographics, census tracts, etc.
- The local housing agency should define the problem relative to housing stock in the jurisdiction.
- CDC can discuss their Childhood Lead Poisoning Prevention Program (CLPPP) and local infrastructure (STELLAR database) and the methodology for identifying properties responsible for multiple lead poisonings.
- EPA can discuss education/outreach, local capacity issues (availability of certified disciplines to carry out lead hazard control activities) and compliance assistance.
- OHHLHC can discuss the availability of individuals trained in Lead Safe Work Practices (LSWPs).

- The local OHHLHC grantee can discuss funds available for application to privately-owned housing.
- OHHLHC and the local HUD Program Office Directors can summarize HUD's overall efforts to create lead-safe housing and eliminate lead poisoning by 2010.

#### Step 4: Designing a Local PPS Strategy

- The PPS Working Group should discuss strategies and resources available at the local level to address these hazards in both federally-assisted and unassisted housing.
- For federally-assisted properties, the local HUD Program Office Directors and OHHLHC can help develop a plan to notify residents of the lead hazards, control these hazards, clear the properties and provide on-going operations and maintenance to ensure the properties will remain lead-safe.
- The primary local agencies and City officials should work with Code Enforcement Official and local housing organizations to develop a plan for notification and controlling lead hazards in unassisted properties.

#### Step 5: Implementing the PPS Strategy

- The primary local agencies should establish a recordkeeping system to include the property address, the medical surveillance information, the housing characteristics, the status of hazard reduction and clearance.
- The local Health Department should identify the addresses of the properties that are responsible for 1) multiple lead poisonings; and 2) a single lead poisoning or elevated blood lead levels.
- OHHLHC recommends that the Health Department will also provide these addresses to City officials, the HUD Field Office Director, and OHHLHC CAED staff who will enter these addresses in their database.
- The HUD Field Office Director can provide addresses to local HUD Program Office Directors.
- For federally assisted properties, local HUD Program Office Directors, in compliance with the Lead Safe Housing Rule, will provide addresses to Program Managers who will coordinate the lead hazard reduction activities through compliance with the Lead Safe Housing Rule.
- The HUD Program Managers will provide a list of cleared properties to the local Program Office Director, who will provide this list to the HUD Field Office Director.
- The primary local agencies and City officials are encouraged to work with Code Enforcement Officials and local housing organizations to contract with inspectors/risk assessors and certified contractors to reduce hazards and clear unassisted properties.
- The primary local agencies and City officials are encouraged to provide a list of cleared properties to the HUD Field Office Director.
- The HUD Field Office director can then compile a list of cleared properties, assisted and unassisted, provide this list to the OHHLHC's Director of CAED.
- OHHLHC's CAED will develop a list of federally-assisted properties that have not received clearance, and provide this list to the HUD Field Office Directors who will contact the appropriate Program Office Director.
- The primary local agencies and City Official retain the responsibility to ensure that lead hazards have been controlled in unassisted properties.

- If property owners are uncooperative, the HUD Program Office Directors and City officials will compile a list of these owners and addresses, and provide this list to the HUD Field Office Director and to OHHLHC CAED for further action.

#### Step 6: Post-Implementation Activities

- The Local Primary Prevention Strategy Working Group should meet regularly to evaluate the status of the lead hazard reduction activities in the jurisdiction.
- The process of oversight of uncooperative owners will be coordinated by the primary local agencies and HUD's CAED. This tracking will include compliance with the Lead Disclosure Rule (LDR) and the Lead Safe Housing Rule (LSHR).
- Local Program Office Directors can provide a regular update of the status of lead hazard reduction activities in federally assisted properties (those responsible for multiple poisonings, a single poisoning or pre-1978 housing with lead hazards) to the primary local agencies and the HUD Field Office Director.
- The primary local agencies should meet regularly (at least quarterly) with the OHHLHC or the HUD Field Office Director to evaluate the effectiveness of the strategy's implementation relative to hazard reduction in the jurisdiction, to provide addresses of additional properties to be addressed, and to discuss other housing issues associated with health.