



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-3000

OFFICE OF HEALTHY HOMES AND  
LEAD HAZARD CONTROL

<b>Policy Guidance Number:</b> 2008-03	<b>Date:</b> November 23, 2008
<b>Subject:</b> Conducting Lead Inspections and Risk Assessments Prior to Environmental Review/Request for Release of Funds	
<b>Status:</b> Current	
<b>Applicability:</b> Recipients of Lead-Based Paint Hazard Control grants and Lead Hazard Reduction Demonstration grants	
<b>Related Guidance:</b> PGI 2000-01	
<b>Comments:</b> This policy guidance issuance replaces PGI 2000-01	

Dear Grantees:

This guidance modifies our policy relating to activities exempt from the environmental review provisions of 24 CFR 58, Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities. Our previous policy guidance, PGI 2000-01, did not permit any lead-based paint inspections or risk assessments to occur prior to completion of the environmental review and obtaining approval of a Request for Release of Funds (RROF – HUD Form 7015.15). Specifically, that Policy Guidance stated that:

*“24 CFR Part 58 (see Appendix B) requires that environmental reviews must be completed prior to undertaking either lead-abatement activities funded under the LBP Hazard Control Grant or associated activities funded from other sources. Undertaking “lead-abatement activities,” “LBP activities,” or “lead hazard control activities” means the LBP grantee’s commitment of any funds for LBP inspections, risk assessments, abatement, or hazard reduction or control.”*  
[emphasis added]

However, “inspections and testing of properties for hazards or defects” may be conducted before receiving approval of a Request for Release of Funds, as allowed by 24 CFR 58.34(a), Exempt activities, specifically its subparagraph (5). Therefore, grantees may conduct lead-based paint inspections and risk assessments on target housing that is otherwise eligible for lead hazard control work before receiving approval of a Request for Release of Funds. All other restrictions apply.