



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

OFFICE OF HEALTHY HOMES AND
LEAD HAZARD CONTROL

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| POLICY GUIDANCE NUMBER: 2018-01 | DATE: March 27, 2018 |
| SUBJECT: | Purpose and Use of Healthy Homes Supplemental Funding (HHSupp)- Revised |
| STATUS: | Current |
| APPLICABILITY: | Lead-Based Paint Hazard Control (LBPHC) and Lead Hazard Reduction Demonstration (LHRD) grantees |
| RELATED GUIDANCE: | Supersedes 2016-01, which required use of the Healthy Homes Rating System for grants that use Healthy Homes Supplemental Funding |

What is Healthy Homes Supplemental (HHSupp) funding?

Healthy Homes Supplemental (HHSupp) funding for the Office of Lead Hazard Control and Healthy Homes' (OLHCHH's) lead hazard control grant programs¹ is used for identifying and remediating multiple housing-related health and safety hazards in addition to lead-based paint hazards. HHSupp funding comes from the Office's annual budget line for the Healthy Homes Initiative, provided pursuant to sections 501 and 502 of the Housing and Urban Development Act of 1970.

What is the purpose of the HHSupp?

HHSupp funding is part of HUD's comprehensive approach to address housing related health and safety hazards that contribute to diseases and injuries in a coordinated fashion, rather than addressing a single hazard at a time.

What restrictions are there in the use of is HHSupp funds?

HHSupp funding is used for identifying and remediating multiple health and safety hazards in homes. HHSupp funding may **only** be used in homes where lead hazard control work (interim controls or abatement) is being conducted.

On the other hand, grantees, sub-grantees, and contractors/vendors who receive lead hazard control funds are **not** required to expend HHSupp funding in every home where they expend lead hazard control funds. The decision is the grantee's (including its sub-grantees and contractors in the decision-making process to the extent the grantee sees fit).

Successful use of HHSupp funding is dependent on a complete and thorough inspection and assessment of a home that identifies hazards for all vulnerable populations.

¹ The Office's "lead hazard control grants" are its Lead-Based Paint Hazard Control (LBPHC) Grant Program and Lead Hazard Reduction (LHRD) Grant Program.

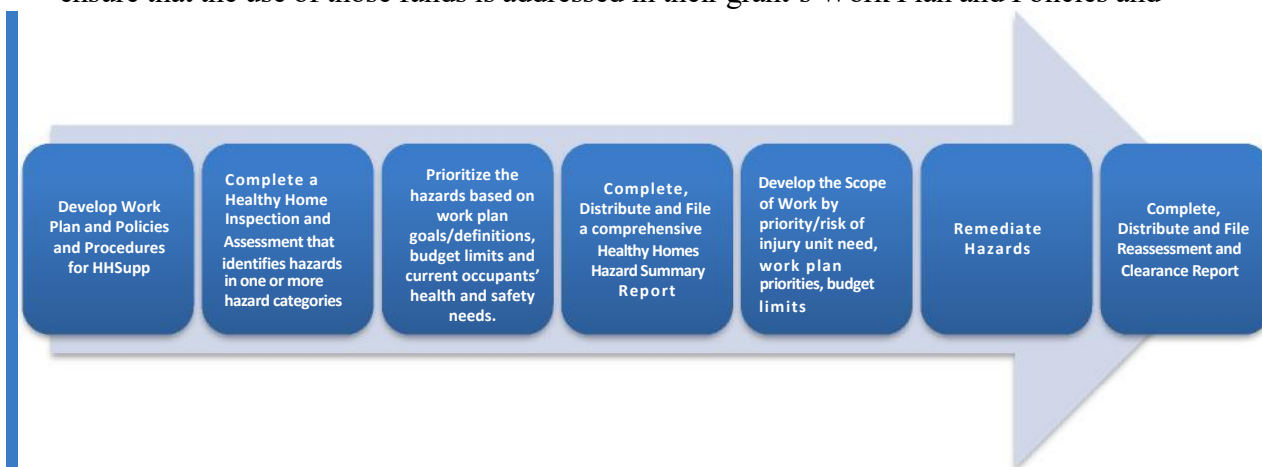
A home inspection, as used here, is the technical and analytical room by room (and exterior) inspection for residential health and safety hazards. Residential problems would include: water leaks, holes in floors, signs of pests, no electrical wiring, etc. See the section on Helpful Resources, below, for links to sample guidance, codes and ordinances that may be of interest in identifying residential health and safety hazards.

The HHSupp home assessment is like a lead based paint risk assessment in that it should utilize the analytical information from the room by room (and exterior) inspection to connect the inspection results to any unique characteristics of the location, materials, use patterns and layout of the home that would contribute to the potential risk of illness or injury that could be posed by the home hazard assessed.

What is the process for remediating hazards using HHSupp funding?

The diagram represents the process for identifying and remediating health and safety hazards in homes using HHSupp funding.

(1) **Grant Work Plan and Policies and Procedures.** Grantees that receive HHSupp funding must ensure that the use of those funds is addressed in their grant's Work Plan and Policies and



Procedures. The Work Plan *must* outline a clear process and prioritization strategy for addressing hazards in addition to lead-based paint hazards. The strategy should include the following information:

- a. Healthy Home Inspection and Assessment Process: A description of the method for completing a healthy home inspection and assessment for identifying hazards, which must be based on:
 - i. Description of hazard categories to be identified in the Healthy Home Inspection and Assessment, and the documentary source(s) of the categories;
 - ii. State and local housing codes and laws impacting environmental health assessment and measurement (See the “Helpful Resources” section, below, for more information on housing codes and laws); and

- iii. Other resources available in the community (or the state, if the grant is to the state) that could be aligned with, integrated with, or supplemental to HHSupp funds for inspection and measurement.
- b. Healthy Homes Inspection and Assessment Methods: The work plan must include a description of how and when eligible homes will be included for HHSupp funds.
 - i. Detail the process and timelines for inspection, assessment and reports, and
 - ii. Identify qualified staff that will be completing the assessment, scope writing, reassessment and clearance
 - iii. Work plan must clearly state that assessors must inspect and assess homes as part of the HHSupp process. Careful consideration should be taken when choosing an inspection and assessment tool that considers staff background and experience to ensure that the tool yields a thorough list of hazards.
 - iv. The tool selected and used must demonstrate assessment and inspection protocol for the hazard categories described in the workplan.
- c. Scope of Work Prioritization of Hazards: A description of how the grantee's programs will prioritize identified hazards, which must be based on
 - i. Work Plan Priorities for HHSupp funds
 - ii. The cost of remediation;
 - iii. Current or intended occupants health and safety needs
 - iv. Local and state needs and data²³;
 - v. State and local housing codes and laws impacting environmental health intervention (See the "Helpful Resources" section, below, for more information on housing codes and laws); and
 - vi. Other resources available in the community that could be aligned with, integrated with, or supplemental to HHSupp funds for home intervention.

(2) **Healthy Homes Hazard Summary Report**

- a. A **Healthy Homes Hazard Summary Report** will be completed, distributed and filed to document all HHSupp activities up to this point in the unit production process. The report will include all unit specific information related to inspection analytics, assessment, a summary of hazards identified, and the prioritization each hazard identified was given in the final report. The information will be summarized by housing unit and provided to the tenant and owner as applicable. The report is expected to include recommendations to address prioritized hazards identified as well as community resources that can be accessed should the participant choose not to proceed in the HHSupp program after this point. The report will be placed in the unit file and unit assessment findings will be updated in the OLHCHH's Healthy Homes Grant Management System (HHGMS).

(4) **Unit Scope of Work**

- a. A scope of work must be developed from the Healthy Homes Hazard Summary Report that clearly identifies the hazards that have been selected to be remediated, the tasks necessary to complete the remediation, estimated cost of the work (the grantee must use

² For instance: Is your county labeled as a "Highest Potential" radon zone by EPA? Are childhood asthma rates high in your local community or state? Do many people in your local community or state visit the Emergency Room for home injuries?

a clearly separate funding track from all lead award funds), and the materials and required specifications that will be used in the remediation.

- b. The scope of work *must* include interventions based on the prioritization of hazards. However, limitations on the amount of funding will prohibit addressing every hazard in many cases. Scopes of work and any amendments to the scopes of work must be maintained in the unit file for the home where the lead hazard control and HHSupp funds are being expended.
- c. Government Technical Representative (GTR) approval is required before proceeding on any HHSupp remediation work that is estimated to be over \$5,000 per housing unit.
 - i. To request HHSupp funds of over 5000 per unit; submit a request to your GTR through the Healthy Homes Grants Management System (HHGMS) that includes:
 - 1. The Healthy Homes Hazard Summary Report;
 - 2. A draft scope of work and an in-house estimate of costs; and a
 - 3. Summary of ownership of unit, income, and occupancy
 - ii. Your GTR will review the request and, if necessary, request additional documentation for review. Determinations to proceed will be made based on unit correlation with grantee work plan, benchmark goals and overall benefit of the selected unit justifying the expense and impact on the grant resources.
 - iii. Do not proceed until you receive approval to proceed from your GTR.

(5) **Remediation of Hazards.** Remediation must be based on the scope of work developed following the home inspection and assessment, and the prioritization of each hazard per the work plan priorities and defined categories. As with the lead hazard evaluation and control work conducted under the grant, the grantee is responsible for the development, procurement, and monitoring of work completion in each unit and common area. All work completed using these funds must be administered in compliance within local and program requirements including using certified contractors, licensing, permits and insurance when they may be required for, e.g., mold remediation, plumbing, electrical, radon, or asbestos work.

(6) **HHSupp Reassessment and Clearance.** Program personnel must conduct a follow-up inspection and assessment following remediation of repairs limited to the hazards addressed in the scope of work. Results of the reassessment must be evaluated and documented to ensure the hazards were addressed adequately to reduce the risk of injury. The Program Staff must complete a Reassessment and Clearance Report that provides clear documentation of the hazards included in the scope of work and resulting condition of the home components after remediation where work was done. The reassessment should indicate whether the hazard still exists in any way, was reduced or condition improved by work completed or if there was no change in the hazards identified that should also be included in the narrative details. The Reassessment and Clearance Report must be maintained in the case file for the home where lead hazard control funds and HHSupp funds are being expended.

What documentation must be provided to owners and occupants?

Any owners and occupants of the home where HHSupp funds were expended must receive the following documentation:

- A copy of the home inspection and assessment;
- A copy of the Healthy Home Hazard Summary Report;
- A copy of the Reassessment and Clearance Report; and
- A list of resources available in the community to address health and safety hazards.

What costs are allowable for HHSupp funding?

Allowable Costs for HHSupp Funding

Costs that are directly related to the identification, assessment, and remediation of housing-related health and safety hazards are allowable costs for HHSupp funding. Allowable costs include the following and may be included in HHSupp budget by task item:

- Reasonable Rate per unit for completion of:
 - Conducting the home inspection and assessment, including the costs of
 - Inspection equipment; and
 - Secondary inspections as required, including inspections by structural engineers, electrical engineers, and other follow-up investigators;
 - Developing the scopes of work and associated reports;
 - Remediating the hazards identified in the scope of work, including the costs of materials used to remediate hazards (expected average HHSupp Unit Cost);
 - Educational Materials individualized to hazards identified in enrolled housing units
 - Training that relates to Healthy Homes assessment and remediation (must be pre - approved by GTR prior to cost incurred)
 - Reassessing the completed work;

Restrictions on Use of HHSupp Funds

A grantee, sub-grantee, or vendor/contractor must **not** use HHSupp funds for the following:

- Salaries and Fringe for any persons including those completing eligible tasks set above
- Administrative Cost including Indirect Cost Rate
- Travel
- Outreach and/or Intake
- General (non-housing unit specific) educational materials
- Supplies
 - Supplies outside of the scope of interventions to address hazards identified within individually completed Healthy Homes Hazard Summary Reports.
- Research, studies, or demonstration programs; and
- Any work conducted in homes where lead hazard control work is not being conducted are **not** being used (e.g., in a home for which a lead risk assessment is or was conducted but the grantee decided not to conduct lead hazard control work, such as because no significant lead-based paint hazards were identified, or the cost of controlling lead-based paint hazards would have been more than the grantee chose to allocate to the home, etc.)

Grantees are encouraged to identify additional resources within their communities that can address needs of individual participants that fall outside the scope of HHSupp funds as they are detailed in this document.

Work Plan Development and Review

The work plan must be reviewed and approved by the GTR prior to any healthy home unit work initiation. The work plan documentation shall include the following components to be approved by the GTR:

- Identify who will be completing the inspection and scope of work.
- Identify when the assessment, bidding, unit work completion and reassessment will occur within the unit production process.
- Describe in detail how the hazards found on assessment will be prioritized by the program for consideration in scope of work. Include any definitions relevant to the prioritization approach.
- Identify the number and average work cost of healthy home units to be completed.
- Describe the priority issues the grant program will seek to invest remediation in when found in enrolled units, and why.
- Describe the intervention approach that is being sought for each of the priorities and what variables would trigger any different level of intervention as applicable.
- Describe how the assessment, prioritization, report scope, invoicing and reassessment will be completed and documented in the unit file.

Helpful Resources

Guidance

- Centers for Disease Control and Prevention and U.S. Department of Housing and Urban Development. Healthy Housing Reference Manual. www.hud.gov/program_offices/healthy_homes/ or www.cdc.gov/nceh/publications/books/housing/housing_ref_manual_2012.pdf.
- Overview of the Healthy Home Rating System. (Includes HHRS operating guidance, hazards chart, scoring tools, and other materials, for use on units evaluated under that System before July 1, 2017, and for units evaluated under that System since then that the grantee has GTR approval for addressing in accordance with the HHRS.) www.hud.gov/program_offices/healthy_homes/hhrs

Housing Codes

- State Housing Codes
 - Healthy Housing Solutions, Housing Codes, <http://healthyhousingsolutions.com/hhtc/state-housing-codes/> (includes a state-by-state directory of housing codes)
 - National Conference of State Legislatures, Healthy Homes, www.ncsl.org/research/environment-and-natural-resources/healthy-homes.aspx (includes a directory of state laws regarding the health of a home environment)
- Local Ordinances
 - Municode, library.municode.com
 - General Code Library, www.generalcode.com/webcode2.html

International Codes

- International Code Council, www.iccsafe.org/codes-tech-support/codes/the-i-codes/

- International Existing Building Code
- International Fire Code
- International Plumbing Code
- International Property Maintenance Code
- International Residential Code