

FY19 NEW GRANTEE ORIENTATION

Lead Hazard Control Grantees: SOW,
Clearance, On-going Maintenance
and Project Monitoring

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Procurement Process Policy Screen Shot

○ Seasoned Grantees: What are some of the bidding processes your programs use for contractors, and how has this process been effective to unit production performance?



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

OFFICE OF LEAD HAZARD CONTROL AND HEALTHY HOMES

Policy Guidance Number: 2017-04	Date: September 18, 2017
SUBJECT:	Office of Lead Hazard Control and Healthy Homes Grant Procurement Standards
STATUS:	Current
APPLICABILITY:	ALL OLHCHH Grants and Cooperative Agreements Fiscal Year 2015 to Current
RELATED FEDERAL REGULATIONS:	OMB Uniform Guidance: 2 CFR § 200.317 through § 200.326 OMB guidelines on debarment and suspension: 2 CFR part 180 Federal Acquisition Regulations: Parts 6, 13, 14, and 15 OLHCHH Policy Guidance 2017-02, Determining Subrecipient or Contractor Classification
COMMENTS:	

This Policy Guidance is being issued to provide guidance and instructions on procurement standards and methods to be used by the Non-Federal Entities that are recipients or subrecipients of grants and cooperative agreements (collectively, here, "grants") from the Office of Lead Hazard Control and Healthy Homes (OLHCHH). The OLHCHH's grantee must provide a copy of its procurement policies and procedures to OLHCHH during the grant negotiations.

A Non-Federal Entity must: (1) Provide for the fair and equitable treatment of all persons or firms involved in purchasing; (2) Assure that supplies, equipment or services are procured efficiently, effectively, and at the most favorable prices; (3) Promote competition in contracting; (4) Provide safeguards for maintaining a procurement system of quality and integrity; and (5) Assure that the Non-Federal Entity purchasing actions are in full compliance with 2 CFR § 200.317 through § 200.326, the grant agreement, and OLHCHH's Policies.

APPLICATION

<https://www.hud.gov/sites/documents/PGI-2017-04.PDF>

Federal Procurement Process Checklist for Unit-File Documentation

Procurement Type Reference <i>OLHCHH Policy 2017-04 Procurement Types</i>	Blanket Purchase Agreement (BPA) Small <i>(Threshold is 150,000)</i>	Blanket Purchase Agreement (BPA) Large <i>(Threshold is above 150,000)</i>	Small Purchase Procedures <i>(Threshold is 150,000 total or less)</i>	Sealed Bids	Competitive Proposals	Non-Competitive Proposals/ Sole Source
GRANTEE MUST SUBMIT THESE DOCUMENTS RELATED TO THE PROCUREMENT TYPE USED						
Local Procurement Policy (if not already on file)						✓
Invitation for Bids		✓		✓		
Request for Quotes (RFQ)	✓		✓		✓	
Request for Proposals (RFP)		✓		✓	✓	
Evaluation Method	✓	✓	✓	✓	✓	
Selection Criteria	✓	✓	✓	✓	✓	
Bid Sheet Summary	✓	✓	✓	✓	✓	
Draft or actual Contract/Agreement with Award Amounts	<i>Overall BPA Scope and Limitations of use</i>	✓	✓	✓	✓	✓

Contractor Pool

- ✓ Maintain an adequate list of certified contractors.
- ✓ Confirm contracting firms, supervisors and workers maintain all required certifications and licensing.
- ✓ Lead Abatement firm, supervisor and worker certification required for OLHCHH projects.
- ✓ EPA Renovation, Repair and Painting (RRP) firm and contractor certification is ALSO required

Work Project Management

Grantees are responsible for monitoring job worksites

- ✓ Has the worksite been set up properly and in compliance with Local/State/EPA/HUD regulations, and does the setup appear to be working as planned?
- ✓ Are residents being kept out of the work area?
- ✓ Are workers avoiding the use of prohibited work practices?
- ✓ Is waste being handled correctly?
- ✓ Are workers using worker protection methods appropriate to the job?

Work Project Management, cont'd

- ✓ Document all worksite monitoring (findings, corrections made) in the case files.
- ✓ Conduct a visual inspection of the project to ensure all work has been completed in accordance with the Scope of Work before scheduling clearance testing.

Project Begins

Bidding the Work:

- ✓ Provide contractors with scope of work and LIRA.
- ✓ GTR approval for over cost projects (Lead - \$20,000; HH \$5,000)
- ✓ Contract for work should be with the contractor, grantee and owner.
- ✓ Issue Proceed Order with project completion date (10 days)
- ✓ Retain all submitted competitive bids in the case file. File retention: at least 3 years from the end of the award's period of performance.

Occupant Protection Plan 40 CFR 745.227 & 24 CFR 35.1345)

- ✓ REQUIRED for abatement (refer to State Guidelines, as well)
- ✓ Developed by a Certified Lead Supervisor or Project Designer and in consultation with the occupant.

Safe Work Practices To Protect Applicants

When should occupants be temporary relocated:

✓the lead hazard reduction and the final cleanup of the work area and adjacent areas cannot be accomplished in one 8 hour working day; and

✓the areas available for occupancy do not provide sufficient bathroom, kitchen and sleeping facilities and entry egress pathways to meet the needs of the occupants

During high dust generating lead activities.

Helpful videos on safe work practices :

Exterior Work Practices:

<https://livestream.com/DHSWebcast/events/5317405/videos/130918491>

Interior Work Practices

<https://livestream.com/DHSWebcast/events/5317405/videos/130909037>

Clearance Testing



A Clearance inspection is required for each unit receiving funding under the Lead Hazard Control Grant program.



Clearance can be conducted 1 hour after cleanup.



Conduct Visual Assessment (Form 15.1): The visual assessment that is part of the standard EPA-HUD clearance procedure.



Identify any remaining deteriorated paint that is or may be lead-based paint.



Identify visible dust, paint chips, or paint-related debris.

Clearance Testing Purpose

The purpose of clearance is to test the containment methods used and ensure safety of the unit prior to re-occupancy.

The expectation is the unit will receive a full clearance which means the sampling must be randomized and include both rooms that work was done and not done, entry ways, and exterior visuals. PLUS PORCHES!!!

Area(s) determined to be high risk/high use areas for children.

Clearance Testing Based on PGI 2017-01: New Policy for Dust-Lead Action

Lead Clearance Standards ($\mu\text{g}/\text{sf}$)

	EPA Standard	New Action Level
Floors	< 40	< 10
Window Sills	< 250	< 100
Window Troughs	< 400	< 100
Porch Floors	NA	< 40

Post Remediation

- ✓ Provide the owner with all documents (LIRA, Scope of Work, Clearance Test Results).
- ✓ Provide the owner with an On-going Maintenance Plan.
- ✓ Conduct at least one reevaluation of project to monitor the effectiveness of hazard control methods used.

Seasoned Grantees: What are your program post on-going maintenance procedures?

On-Going Maintenance Disclosure Example

II. On-Going Monitoring & Maintenance Acknowledgement

DATE: June 6, 2017 PHONE: _____

PROPERTY OWNER(s): _____ (LL)

PROPERTY OWNER(s): _____ (LL)


PROPERTY ADDRESS: _____

I/We, the undersigned, have been informed by the CityXXXXX of Unit of the need for on-going monitoring of the completed remediation and/or improvements made to your home.

I/We understand that it is the responsibility to upkeep all areas and continue to use lead-safe practices in order to stop the spread of any lead dust or debris that may be present in the home. (Especially homes built Pre-1978)

I/We further understand that it is my/our responsibility to monitor and maintain all work completed in order to keep the housing unit safe and secure. An inspector has conducted a final inspection to ensure that the work was completed in compliance with the work specifications. By following the recommendations of the inspector this will help to ensure the house will be properly maintained. It is the purpose of these guidelines to provide the homeowner with a decent, safe and sanitary home to live in, following this maintenance plan will help keep repairs and upgrading of systems up to regulations.

Owner(s) 4 (47) 14 / 4 / 1 6-27-17 Date Y//1114t. Az 1-7


HNRUS

Unit Work Recap Checklist for Program Managers

- ✓ Check your old reports. If more than 12 months old, perform a new risk assessment and update your report prior to writing your work specifications;
- ✓ Check your inspector's and risk assessor's, lead firm, supervisor and worker certifications to verify they are current;
- ✓ Check your PCS sheet for your XRF to verify it is up to date
- ✓ Confirm the Scope of Work for LHC interventions correlates with the lead hazards (LBP, dust and soil) identified in the LIRA and incorporates recommended remediation options.
- ✓ Monitor work in progress.
- ✓ Achieve a final Clearance that can be paid by grant funds
- ✓ Failed Clearances should be paid by the contractor as best practice
- ✓ Provide owner with all documentation and an on-going Maintenance Plan.

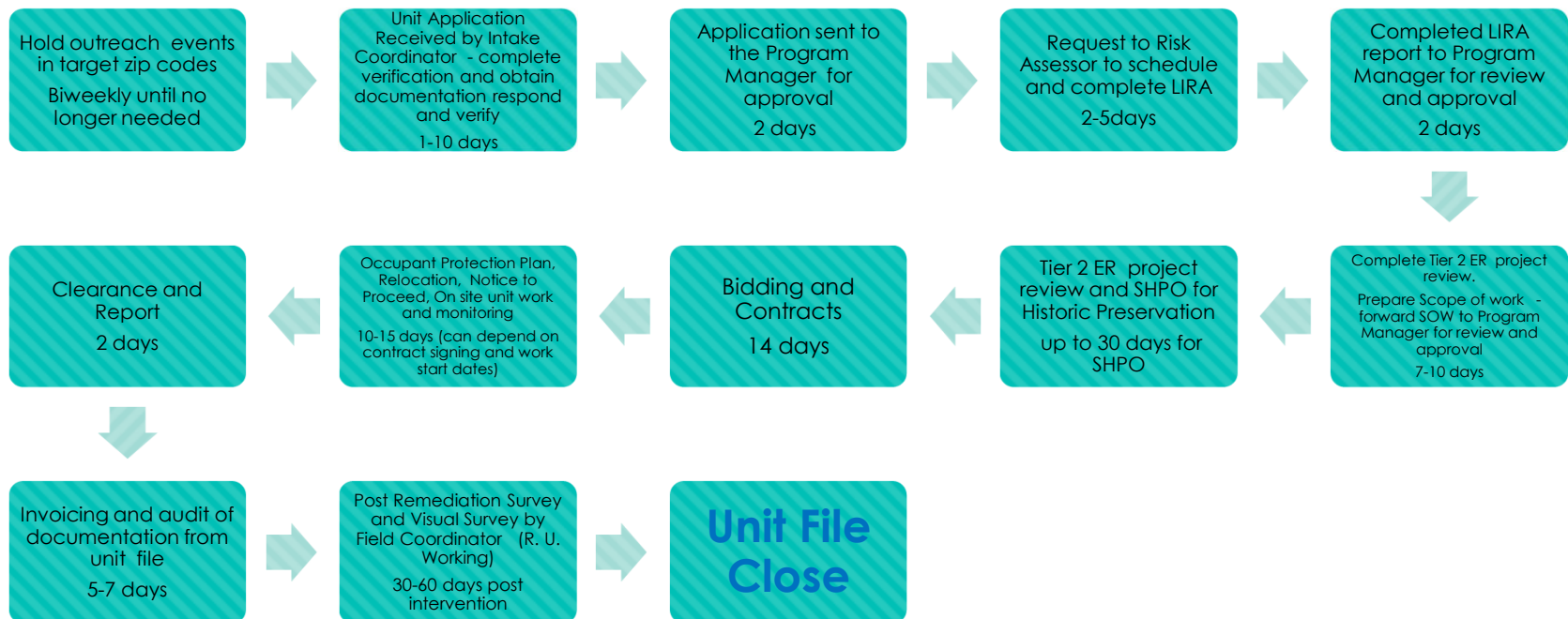


High Cost Unit Reminder

- ✓ Lead Hazard Control Projects over \$20,000 require GTR approval before signing contracts for work.
- ✓ Healthy Homes Projects over \$5,000 require GTR approval before signing contracts for work.
- ✓ Submit requests in HHGMS.

NOTE: Failure to get approval could result in a finding from Office of the Inspector General (OIG).

Project Flow Chart Activity from Intake to Post Remediation and Q&A Interaction



A teal-colored header with a fine, repeating geometric pattern of small squares and lines, resembling a woven or grid texture. It occupies the top portion of the slide and has a small notch on its left side.

QUESTIONS????