

FY19 NEW GRANTEE ORIENTATION

Relocation and Occupant Protection Plan

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Objectives

- Discuss the need for an occupant protection plan, program preparation, and managing expectations
- Discuss temporary relocation during lead hazard control reduction:
 - Requirements
 - Options
 - Need for ongoing monitoring and maintenance

Occupant Protection Plan

- The Lead Certified Contractor or Project Designer should prepare the written Occupant Protection Plan as required. They should also provide a copy to the Program Manager or designee and Occupant.



Occupant Protection Cont'd.

- Occupant Protection Plan provides a checklist of actions the contractor will take to protect the occupant, while paint is disturbed. While work is in progress, occupants must stay out of the work areas.
- The contractor will do daily clean-ups, but the work area may still contain dangerous levels of dust-lead.
- The Occupant Protection Plan is required to:
 - Be unique to the dwelling or facility
 - Be developed before the lead hazard control work;
 - Describe the measures and procedures that will be taken to protect the occupants from exposure to lead-base paint hazards; and
 - Plan must reflect a planned work period of no more than 10 business days;
 - If temporary relocation not necessary, describe measures to protect he occupants during remediation; and
 - Be prepared by a certified lead-based paint abatement supervisor or certified project designer.



How the Program Must Use Occupant Protection Plan

- The program must review and approve the occupant protection plan
- Relocation must be directly related to the occupant protection plan on file
- A copy of the reviewed and approved occupant protection plan must be included in the unit file

Managing Expectations

- Residents must be educated on lead hazards and the restrictions regarding access to the containment areas.
- Occupant(s) may not enter the unit during lead hazard reduction activities;
- Lead hazard reduction work must be complete and clearance achieved before access is allowed if the containment is removed in any way!



Managing Expectations, Cont'd.

- Add program expectations and requirements to:
 - Intake and education efforts prior to enrollment so they understand the expectations of this **VOLUNTARY** program
 - Owner agreement/ contract with what penalties occur if they are noncompliant

Occupant Protection

- If lead hazard control work is conducted throughout the unit and relocation is not required (daily cleanup); proper containment must be installed for the protection of the resident
- Provide supporting unit documentation that relocation was determined not to be needed for overnight and what was done to keep the occupant safe and have access



Occupant Protection, Cont.d'

What should daily cleaning look like?

- All areas must be cleaned **daily** so that no debris or paint chips remain
- No protective sheeting or debris may be left outside the dwelling overnight
- **Frequent cleaning is required**



Why Occupant Protection Plans are Important?

- Containment is used to protect the occupants and workers from the lead hazards produced during lead remediation
- Clearance is a way to test the effectiveness of the containment used
- What are the requirements for OLHCHH?



Program Prep for Handling Relocation

Clearly Outline:

- What assistance will be provided
- How and when the need for relocation assistance will be completed and documented in the unit file
- Occupant/Tenant given advance notice of temporary relocation
- Occupant/Tenant has the right to return after lead remediation work is completed
- Length of time to be temporarily relocated
- Apply resources when the need arises based on scale in Policies and Procedures

Clearance Requirements

Chapter 15: Clearance, page 15.15 – (3B) Sampling of Rooms, Units or Areas

At a minimum clearance for interior work should cover:

- Clearance requires dust samples be collected in four selected room in the work area (or all of the work area room, if fewer than four);
- The area outside each containment area
 - One floor sample outside of and within 10 feet of each containment area
- Each Passageway used by workers walking to and from the work area
 - Specifically:
 - One floor sample along each passageway used by workers



Relocation

- Occupants of rental units must be provided with temporary relocation assistance if the occupant protection plan requires relocation due to the amount of work required.
 - You are not required to provide relocation assistance to owner occupants; however you may wish to assist if your budget allows

Relocation, Cont.d'

Overnight relocation of occupants is **NOT** required if:

- Treatment will be completed within 5 calendar days
- The work area will be sealed; at the end of the area within 10 feet of the containment area will be cleared of debris and cleaned; occupants will have safe access to sleeping areas, bathrooms, and kitchen facilities; and treatment will not create other safety, health, or environmental hazards.
- Entryway is provided that is free of dust-lead hazards, soil-lead hazards, and debris
- Exception for Elderly Residents – (62 years of age or more) If elderly residents are permitted to stay in their units when temporary relocation would normally be required:
 - Must be fully informed about the nature of the work and the hazards; that may be generated;
 - Required to sign an informed consent form before the work begins;
 - No children should not be permitted in the unit.
 - If they refuse to sign, the property owner and the contractor will have to determine whether or not the job will be performed.
- Grantee Monitoring*

Managing Expectations

- Occupants will not be permitted to enter the worksite during lead hazard reduction activities
 - Tell them early in the enrollment and contract phase
 - Occupant cannot access any items once they leave (i.e. Football, medicines, uniforms, band instruments, etc.) cannot be retrieved by the homeowner without the contractor and program involvement.
 - Have a plan in place to address these needs in your Policy and Procedures.



Relocation Cost

- Temporary Relocation Lead-Safe Housing (up to 10 days);
 - Motel/ apartment owners
 - Lead Safe Houses - utilities
 - Stipend for food
 - Storage, pods, security locks for the doors (Grantee)
 - Moving and hauling expenses (If part of written agreement)
 - Persons with disabilities must be placed in housing that provides, at a minimum, the same accessibility features as the housing in which they currently resides.
 - Owner-occupants temporarily relocating may receive assistance but are not entitled to URA relocation assistance for relocation based on needs assessment completed at enrollment and based on the discretion of the program policy and procedures approved by the GTR.
 - Choosing options in your target area is a solid justification or contracting with specific locations

Relocation Requirements

- It is preferred that occupants will be temporarily relocated to a lead-safe unit before and during hazard reduction activities for their protection.
 - Assess the need to find relocation options for all clients and expect that at least one day will be needed for clearance.



Managing Expectations

- Include relocation details in:
 - Instruction/ discuss during the application and enrollment phase
 - Occupant and owner contract expectations
 - Policy and procedures
- This is a **voluntary** program and it is expected that they will participate by securing their belongings on their own and cooperate with relocation requirements or face potential consequences



Managing Expectations, Cont.d'

- Educate the applicants that their belongings need to be moved to the center of the room or out of the workspace prior to the work starting
- Grantee Monitoring
 - Occupants' belongings must be securely covered if left in the containment area will be covered with appropriate materials or relocated to a secure area outside the containment area

Relocation Cost

- Moving services/ company allowance
 - Resources can be made available given the need for removal of items out of the home, but it is not expected that all units will need these resources.
 - Use only as a last resort, belongings should be placed under sealed containment whenever possible.



Miscellaneous Cost

- Food stipends
- Compliance incentives
 - Don't recommend this as there needs to be some investment by the applicant
 - Document who gets this and how justified at a minimum
- Public transportation cost
 - Be sure these are associated with a needs assessment and that they are provided on a scale equally to those who have need. You must justify the dollars being paid out (i.e. kids going to school, etc.)

Occupant Protection

- Post Clearance, occupant(s) shall be responsible for areas of identified lead-based paint that are not abated;
 - Monitoring potential hazards
 - Reporting (rental) repairing (owner) damaged surfaces
 - Reporting and maintaining new issues occurring in the property to prevent lead hazards from occurring after clearance; such as water intrusion and structural damage

Questions

Resident protection and worksite preparation

Refer to Chapter 8

The HUD Guidelines for the Evaluation and Control of
Lead Based Paint Hazards in Housing

- Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), 42 U.S.C. §§ 4601-4655

