

Healthy Homes Production Grant Program
Frequently Asked Questions
August 26, 2022

General Healthy Homes Production Grant Questions

Question: Is there a \$10,000 cap per unit?

The Office of Lead Hazard Control and Healthy Homes (OLHCHH) does not have “a cap” for its programs. Per Section F. Program Specific Requirements, 1. Eligible activities, OLHCHH anticipates an average unit cost of \$10,000. For healthy homes unit intervention costs greater than \$10,000 requires GTR approval.

Question: Could you please explain the match requirements?

Statutorily, match is not required for this program. However, the OLHCHH strongly encourages it. Applicants who wish to contribute match sources to their potential grant funding should follow guidance provided in section III. Eligibility Information, C. Cost Sharing or Matching. and F. Program-Specific Requirements. 3. Program Requirements and Prohibitions. w. Matching Funds Requirements.

Question: Could our matching funds come from another federal funding source such as the weatherization assistance program?

Per section III. Eligibility Information, F. Program-Specific Requirements. 3. Program Requirements and Prohibitions. w. Matching Funds Requirements., permissible match contributions may include any state or local government sources, e.g., CDBG funds (which are statutorily considered state/local funds), and any private contributions, foundations, etc. may be used as match providing the funds are designated to complete the specific activities and/or allowable costs identified in the NOFO. Federal sources (e.g., HOME or Weatherization Assistance Program funds) are not allowable sources of match.

Question: Are there extra points for providing match?

No, extra points will not be provided if applicants provide match contributions. The match contribution is strongly encouraging to help leverage potential grant funding activities.

Program Requirements & Applicant Eligibility Questions

Question: Will grantees have to set quarterly performance milestones like the previous HH grants, and will the transaction system be the same as in the LHR program?

Awarded grantees are required to set up quarterly milestones and reports in the Healthy Homes Grant Management System (HHGMS). Reimbursement payments will still be processed through the electronic Line of Credit Control System (eLOCCS). Additional details about reporting and grant disbursements can be consulted with a grantee’s Government Technical Representative.

Question: What is the grant payment term? Is this a reimbursement-based grant?

Yes, the Healthy Homes Production Grant Program is reimbursement-based grant.

Question: Can the funds be used for properties that are intended to be sustainable income for the nonprofit organization?

No, Healthy Homes Production Grant funding may not be used on properties that nonprofit organizations have financial ties or interest in.

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Question: Are there requirements for having children in the home, or a mother who is pregnant and/or visiting the home frequently?

Per section I. Funding Opportunity Description. A. Program Description. 1. Purpose Applicants receiving a Healthy Homes Production Award will be expected to prioritize units and/or buildings where families with children, older adults sixty-two (62) years and older, or families with persons with disabilities. Aside from prioritizing units for the populations mentioned, there are no other family requirements for this program as the lead hazard control programs.

Question: Does the Program Manager need to be a person that meets that definition by our agency, or could it be an equivalent position such as a project manager or EH Supervisor who is "managing the program"?

Yes, internally applicant can decide to change the title of position, but position description must adhere to the qualifications provided in the NOFO.

Question: A Program Manager is required to spend 50% of their time on this grant. What is the time requirement for the Project Director?

The Healthy Homes Production Grant NOFO does not explicitly state what percentage of time the Project Director/Program Director should spend on the grant. However, the key role for and responsibilities for this grant falls on the Program Manager. Therefore, the Project or Program Director should not spend more time on the grant than the Program Manager.

Question: Is the 65% exclusively for Lead Safety or for all identified environmental health and safety concerns?

Per section III. Eligibility Information, F. Program Specific Requirements. 1. Eligible activities. Healthy Homes Direct Costs., Awardees must expend at least sixty-five percent (65%) of grant funds on direct costs defined specifically as healthy homes identification and remediation activities in the home. The Healthy Homes costs can be used for healthy homes identification and remediation activities in the home. Moreover, grant funds should be used to address housing issues that may impact resident health. As a result, this money should not be used exclusively for lead as the OLHCHH has separate funding to address that issue.

Question: Is the 80% income threshold the state or area median income?

Per section III. Eligibility Information, G. Criteria for Beneficiaries. all units assisted with grants must be the residence of families with income at or below eighty percent (80%) of the area median income level.

Question: Can 1979 and older housing be enrolled with a PRIORITY for pre-1978? In other words, is the funding limited to pre-1978 or just pre-1978 priority?

Applicants should prioritize pre-1940 and pre-1978 housing for the Healthy Homes Production Grant Program but grantees can address healthy homes hazards in newer housing stock if healthy home interventions are needed.

Question: Can we utilize our CDBG rehabilitation funds in conjunction with this program as matching funds?

Yes, Community Development Block Grants (CDBG) funds can be used as match for this program. However, please be mindful that match funds can only be utilized to execute eligible Healthy Homes activities.

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Question: Can this funding be used to remediate and renovate abandoned buildings to create housing for folks?

Per section III. Eligibility Information, F. Program-Specific Requirements. z. Limitation on use of funds., applicants may not use grant funds for purchase of real property or demolition of housing units or detached buildings as a means of healthy home intervention and/or the replacement of such structures. Renovation of buildings to create housing is also not allowed.

Question: Can you please explain further the indirect costs. If the administrative costs are restricted to 10%, and the administrative costs include the indirect costs our indirect cost rate would have to be lower than 10%, and we would not be able to use our negotiated rate. Do you expect us to cost share or waive the indirect costs?

An applicant can certainly use the negotiated rate. If an applicant is concerned, they will go over the administrative 10% cap, an applicant can reduce their indirect cost amount. Since the indirect cost rate will be lowered, an applicant can claim the unrecovered indirect costs as match per OMB Guidance.

Question: Is there a requirement for affordability period of three years?

For the Healthy Homes Production Grant Program, there is not a three-year period of affordability requirement.

Question: If we start an income verification and work begins, but is not cleared within 6 months and we must recertify income and find that the applicant no longer qualifies, what do we do?

If the lead hazard control work is started on-site (i.e., hammer and nails) within in six months, recertification of income is not required.

Healthy Homes Activity Questions

Question: Who will provide training for this grant program?

OLHCHH will provide training for the HHP grantees (i.e., New Grantee Orientation and Program Manager School). Grantees can also take additional training based on the need of program (to make it successful).

Question: Is Healthy Homes Principles training a requirement for the Program Manager?

In order to develop Health Homes Assessments, a Healthy Homes Principles Training course specifically for the Program Manager is required. The grantee may choose to participate in a Healthy Homes Training from a list provided by HUD or the grantee may select a Healthy Homes Principles trainer they are familiar with in their community. Please refer to the Healthy Homes Training Providers 2022 Contact List document for a sample list of Healthy Homes Trainers.

Question: HUD has a 29-point assessment set of requirements, right?

No, the the HUD does not have a 29-hazard chart is not a requirement. The 29 Hazards Chart serves as a tool to evaluate for housing-related health hazards. The Eight Healthy Homes Principles, which is used as sample tool to identify and correct hazardous conditions that pose a likelihood of harm to occupant health.

Question: Will there be more information provided on relocation?

Temporary relocation is allowed in specific cases where a family is temporarily displaced while longer

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remediation assistance (such as lead hazard control remediation) is conducted. As a result, a grantee, may relocate a family until the time the affected unit is properly cleared for re-occupancy. Most Healthy Homes interventions typically do not require relocation; as a result, please consult with your Government Technical Representative should you have questions about this assistance. For relocation associated with lead hazard control work, please refer to Policy Guidance 2015-01: Clarification of Costs for LBPHC and LHRD Grant Programs [here](#).

Question: Is there a list of eligible activities that meet the healthy homes requirement?

Per section III. Eligibility Information, F. Program Specific Requirements. 1. Eligible activities. Healthy Homes Direct Costs are described. Additional information regarding healthy home activities can be found in Policy Guidance 2018-01: Purpose and Use of Healthy Homes Supplemental Funding found [here](#). New and updated HHP Policy Guidance will be provided to grantee soon.

Question: I cannot find the list of hazards that is referred to in the NOFO. Can you please provide another link?

A list of Healthy Homes Hazards can be found [here](#).

Question: Can experience with healthy homes assessment substitute Healthy homes certification?

While experience with healthy homes will be helpful, it may not substitute the Healthy Homes certification. Awarded grantees must attend the Healthy Homes New Grantee Orientation and a Healthy Homes Principles Training.

Question: Must each home have a report or testing results that shows a hazard e.g. mold etc.?

Yes, in order provide healthy homes assistance, each qualifying unit must have a healthy homes assessment completed.

Question: Could awarded funds go toward replacing inferior heating equipment that poses a health risk such as dust and air quality, along with fire risks such as electric baseboard, wall heaters, inefficient forced air systems, etc.?

Depending on the Healthy Homes Assessment provided on the home, some of the interventions mentioned may be addressed.

Question: Can funds be used for health and safety improvements such as furnaces, hot water heaters, roofing repairs, leaking windows.

Depending on the Healthy Homes Assessment provided on the home, interventions mentioned may be addressed.

Question: If we have licensed assessors and certified healthy homes inspectors on staff who complete our assessments. Would their time spent on assessments and inspections fall under the \$10,000 average unit cost?

The staff licensed assessors and certified healthy homes inspectors' time will fall under personnel costs, not the \$10,000 average unit cost.

Question: Am I also right to assume that soft costs that include application intake and approval are outside the \$10K average?

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Yes, the soft costs identified in the NOFO fall outside of the \$10,000 average unit cost.

Question: Is permission required to spend more than \$10,000 on any one home?

Yes, approval from the assigned Government Technical Representative (GTR) to spend more than \$10,000 on a unit is required, pending supporting documentation provided for the approval.

Question: Do landlords have to commit to rent to Low Median Income (LMI), other eligible clients/children, etc. if their units receive funding?

Given the program is designed to address hazards within the homes of families 80% and below average are below eighty percent (80%) of the area median income, landlords should commit to renting units at or below this income range.

Question: Will we need to do an environmental review? Do we need a Tier 1 review and then a Tier 2 for each individual property?

The simple answer is “yes”, the program is subject to 24 CFR part 58, and the most efficient and economical process to comply with Part 58, is to prepare a tiered environmental review. If awarded, you will be required to obtain access to and use the HUD Environmental Review Online System (HEROS), to prepare and maintain Environmental Review Records for the grant program and projects. Comprehensive guidance and training will be provided following grant awards. Also see APPENDIX C of the NOFO: **Environmental Requirements**, Award of an FY 2021 Healthy Homes Production Grant does not constitute approval of specific sites where activities that are subject to environmental review may be carried out.

Recipients of funding under this NOFO that are states, units of general local government or Native American tribes must carry out environmental review responsibilities as a responsible entity under 24 CFR part 58, “Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities.” For recipients that are not a state, unit of general local government, or Native American tribe (or a consortium with such a government as principal applicant), the responsible entity designated under section 58.2(a)(7) will (per sections 58.1(b)(7) and 58.4(a)) perform environmental reviews of proposed activities under part 58. Under 24 CFR 58.11, where the recipient is not a State, unit of general local government or Native American tribe, if a responsible entity objects to performing the environmental review, or the recipient objects to the responsible entity performing the environmental review, HUD may designate another responsible entity to perform the review or may perform the environmental review itself under the provisions of 24 CFR part 50. When HUD performs the review itself, following grant award execution, HUD will be responsible for ensuring that any necessary environmental reviews are completed. If awarded, grantees will receive Environmental Review training with the Environmental Review Officer.

Question: Does the assessment have to cover all Healthy Homes categories, if we are focusing on certain aspects of healthy homes issues?

Yes, all Healthy Homes hazard categories should be included in the assessment; however, all interventions do not have to be addressed in the scope of work. The determination of which hazards to address is at the discretion of the Program Manager.

Radon Testing Questions

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Question: What is the typical cost for radon testing and remediation? I know this will vary across the country but wanted to get a sense of what you are anticipating?

Per section III. Eligibility Information, F. Program Specific Requirements. 1. Eligible activities. Healthy

Homes Direct Costs ii. Radon Testing, the average cost of professional radon testing is about \$140 for a single-family home, with an average mitigation cost of \$1,500.

Question: If one must do radon testing, then does one have to address radon remediation?

Yes radon testing and remediation is a requirement of the Healthy Homes Production Grant Program NOFO.

Question: Does the grant opportunities include radon testing, radon mitigation and awareness education?

The Healthy Homes Production Grant Program funding includes radon testing and radon mitigation. Awarded applicants should also include radon information in their outreach or healthy housing education materials.

Question: If our staff is licensed and credentialed in our state can we do the radon testing "in-house".

If the staff person meets the requirements for radon professionals as identified in the NOFO, yes, radon testing may be completed by in-house staff. Per section III. Eligibility Information, F. Program-Specific Requirements. 1. Eligible activities, ii. Radon testing must be conducted by a professional who is currently credentialed by the National Radon Proficiency Program or the National Radon Safety Board (NRPP/NRSB) and licensed/certified in the state in which the work is being conducted. If radon mitigation is required, grantees are advised to follow local procurement policies to secure a certified radon mitigation specialist.

Question: Are Radon assessments, and Lead Inspection Risk Assessments part of the \$10,000 target per unit, or considered in a different category?

Yes, radon assessments and Lead Inspection Risk Assessments (LI/RA) are part of the \$10,000.00 identified average per unit expenditure.

Question: If a state does not have an NRPP requirement for Contractors to perform Radon Remediation, are they then still required to obtain that certification?

As indicated in the NOFO, a radon professional who performs mitigation must have a credential from either the National Radon Proficiency Program or the National Radon Safety Board (NRPP/NRSB) and licensed/certified in the state in which the work is being conducted, if the state has this requirement.

Lead Hazard Reduction and Healthy Homes Questions

Question: Can an organization have Lead Hazard Control, Healthy Homes Supplemental, and Healthy Homes Production funding?

Yes, an organization can have Lead Hazard Control, Healthy Homes Supplemental Funding, and Healthy Homes Production funding. However, Healthy Homes Production funding and Healthy Homes Supplemental funding **cannot** be combined.

Question: Can this grant program be used in combination with the Lead Hazard Reduction Grant Program?

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Yes, if a current program does not have Healthy Homes Supplemental funding, Healthy Homes Production Grant funding may be used in combination with a Lead Hazard Control program. If a Lead Hazard Control program has Healthy Homes Supplemental funding, Healthy Homes Production grant funding may not be used.

Question: If we received Healthy Homes funding for a portion of our Lead Hazard Reduction grant, are we eligible for this funding? Wouldn't the reporting be separate for these two grants?

Applicants who have Healthy Homes Supplemental funding and a Lead Hazard Reduction Grant are eligible to apply for this funding. As mentioned previously, because the Healthy Homes Production and the Healthy Homes Supplemental program are separate, grantees of the Lead Hazard Control and Healthy Homes Supplemental grant program may receive Healthy Homes Production (HHP) program and must manage them separately. Please note the Healthy Homes Production grant program awarded applicants must hire separate staffing to manage the grant.

Question: Are we required to complete lead inspections in all pre-1978 properties?

Under Program Requirements and Prohibitions, "I. Lead-Based Paint and Lead-Based Paint Hazard Identification. A complete lead-based paint inspection and lead hazard risk assessment, evaluating each housing unit, common area, exterior surface, and bare soil (and not a sample of any of them), including either separate reports or a combined report is required for all pre-1978 properties enrolled under this program. Presumption of the presence of lead-based paint or lead-based paint hazards is not permitted. Paint inspections and risk assessments must follow the procedures as defined in the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing and as defined by the policies of the Lead Hazard Reduction Grant Program. Refer to Policy Guidance 2013-01: Conducting Lead-Based Paint Inspections and Risk Assessments for Lead-Based Paint and Lead-Based Paint [here](#) for additional requirements."

Question: Will HUD require Lead Abatement certification for all contractors or will RRP be accepted?

All Lead Inspections and Risk Assessments (LI/RAs) must be conducted by a licensed Lead Risk Assessors. Interim controls may be completed by certified Renovation, Repair, and Painting (RRP) firm, or certified lead abatement contractor, and lead abatement activities must be completed by a licensed lead abatement contractor.

Question: Can you use the \$10,000 on a unit with lead, and not address lead (leave behind lead hazards)?

No, you cannot "leave behind lead hazard." If lead hazards are identified in a unit, at a minimum interim controls (i.e., paint stabilization) must be completed by a RRP firm to address the lead hazards and clearance conducted by a licensed lead professional (i.e., lead technician, lead inspector or lead risk assessor).

Question: Is lead in water a hazard that can be addressed with the funds?

Generally, lead in water cannot be addressed with the Healthy Homes Production funding; however, funding may be used to replace/repair the pipes, faucets, and fixtures **within** the home, not outside of the home. The Healthy Home Production grant does not cover lateral plumbing, the sanitary sewer pipe that carries wastewater from a home to the public sewer main that is typically in the street.

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Question: If I am a Program Manager for a current lead grant can I become a Healthy Homes Program Manager at same time?

No, the Healthy Homes Production Program is a separate program that has a strict 50% of time requirement and is a full-time position. Similarly, the Lead Hazard Control Program Manager must dedicate at least 75% of time requirement, which is also mandatory. Therefore, it needs to be separate staffing for each grant.

Question: If we leverage this with our current lead grant can we count the unit for both programs, and can this grant be considered match towards our other lead grant.

If you currently have Lead Hazard Control and not Healthy Homes Supplement funding, you can address the unit with Healthy Homes Production funding and count the unit as they require separate reporting requirements. No, the Healthy Homes Production Grant funding may not be considered match towards the lead program.

Question: Will HUD disqualify any applications under this NOFO for applicants/jurisdictions that have received other HUD money for Lead Abatement/Healthy Homes?

No, the Office of Lead Hazard Control and Healthy Homes will not disqualify any applications under this NOFO for applicants/jurisdictions that have received separate HUD money for Lead Abatement from another division. However, if awarded, please be mindful to keep the funding sources and program requirements separate.

Question: Lead Inspection Risk Assessment (LIRA), Healthy Homes Assessment and Radon inspections are required for each unit. Are there any other required inspections required for developing scope of work?

Healthy Homes Inspections (which include radon inspections) are required for each unit and to develop scopes of work. Lead Inspection Risk Assessment (LIRA) are only required if an awarded applicant chooses to address lead hazard issues with this funding. Additional information regarding Healthy Homes Assessments will be provided during New Grantee Orientation.

Question: Is Dust Sampling Is this required for all homes?

If the applicant plans to address lead hazard issues with the Healthy Homes Production funding, dust wipe sampling is required.

Question: If a property was completed in a previous lead grant, but no healthy homes (supplemental) funds was used, could you go back and use this healthy homes funding to look for healthy homes issues?

Yes, if the property did not receive previous Healthy Homes Supplemental funding, the new Healthy Homes Production Grant may address Healthy Homes issues. If the risk assessment (expires after 12 months) identifies lead hazards again, then the lead hazards must be addressed. The unit may be counted under the Healthy Homes Production quarterly report only.

Question: Do you recommend that a current lead grantee apply if they have healthy homes supplemental funds? The NOFO seems to encourage lead programs to apply.

If an applicant currently has Healthy Homes Supplemental funding through the Lead Hazard Control grants, they may apply for Healthy Homes Production Grant Program. However, applicants must be mindful the Healthy Homes Production Grant Program and the Healthy Homes Supplementation Program are separate

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grant programs that require separate staffing and funds cannot be commingled with each other.

Question: What are the HUD requirements of an MOU or agreement with contractors? All goods and services related to grantee activities must be procured through a competitive process. As a result, HUD strongly encourages grantee to enter Memorandums of Understanding (MOUs) or subrecipient contracts depending on the services rendered. The designation of an entity as a sub-recipient or contractor must follow program policies and 2 CFR 200.330. Moreover, grantees must follow federal procurement requirements as defined in 2 CFR 200.317 through 200.326, as applicable. For further reference see Policy Guidance 2019: Determining Subrecipient or Contractor Classification <https://www.hud.gov/sites/dfiles/HH/documents/PGI%202019-01.pdf>.

Question: Does this program only address homeowner occupied applicants?

Grantees under the Healthy Homes Production Grant may address housing-related health hazards in rental and owner-occupied units.

Question: Under what circumstances would you recommend using a risk assessor vs a RRP inspector?

All Lead Inspections and Risk Assessments (LI/RAs) must be conducted by a licensed Lead Inspector Risk Assessors. Interim controls may be completed by an EPA's Renovation, Repair, and Painting (RRP) certified contractor.

Question: Does HUD follow the Davis Bacon act?

The Davis Bacon Act does not apply to this program.

Unit or Property Eligibility

Question: How many homes are we expected to complete?

The Healthy Homes Production Grant Program NOFO does not designate how many units are expected to be completed. Applicants should evaluate their community need and make data-driven decisions for the homes they anticipate assisting.

Question: Is a property eligible if it has project-based rental assistance (not HUD 202)?

No, per section I. Funding Opportunity Description. A. Program Description. 1. Purpose, privately-owned, low-income rental and/or owner-occupied housing are eligible. Tenant-based voucher holders Section 8 tenant based) are eligible for the grant program, but not project-based rental assistance of any kind.

Question: Can funding be used for mobile homes, pre-1978?

Manufactured homes or mobile homes are not eligible for the Healthy Homes Production Grant Program.

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