U.S. Department of Housing and Urban Development (HUD)
Office of Lead Hazard Control and Healthy Homes (OLHCHH)

FY21 NEW GRANTEE ORIENTATION



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



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Objective

 The session will talk about on-going management and oversight activities of contractors and unit work activities.

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

High-Cost Unit Reminder-Before you start the work

- 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 GTR approval prior to working on high-cost unit could result in no reimbursement of funds

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

Project Monitoring Checklist Example

_	AILY Work Site Check Projecte		ate: _	
Unit Address:				
Date:				1
Time:				
Contracting Compar	y:			
		VEC	NO	NI/A
Badges worn while working		YES	NO	N/A
All Personal Protective Equipmen	t (PPE) worn			\vdash
	furniture covered, ventilation system cover	ed)		\vdash
HEPA VACCUMS ON SITE				\vdash
EVIDENCE OF PROPER CLEANING	PRODUCTS (TSP, ETC)			
	RIER SYSTEMS (CONTROLLING LEAD	<u> </u>		
HAZARDS PROPERLY)	·			
THREE-BUCKET CLEANING SYSTEM	N			
Designated eating area				
Designated decontamination are	3			
Warning signs at all Entrances an	d Exits			
Waste storage container (w/warr	ning sign)			
Work area roped off from public				
Shut off and locked electric box (w/warning sign)			
Any workers smoking				
Photos taken at site (Y or N) Scope of work for the day (LIST O	R ATTACH SOW with highlighted da	ay's work):		
Room / Area	Room / Area Component(s)			

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.

On-Going Maintenance Disclosure Example

II. On-Going Monitoring & Maintenance Acknowledgement DATE: June 6, 2017 PHONE: PROPERTY OWNER(s): 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) 11We 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.

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 ongoing Maintenance Plan.



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

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

Procurement Process Policy Reference

OFor more details on contracting requirements, please review policy.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

WASHINGTON, DC 20410-3000

OFFICE OF LEAD HAZARD CONTROL

Policy Guidance Number: 2	017-04	Date: September 18, 2017		
SUBJECT:		Office of Lead Hazard Control and Healthy Homes Grant Procurement Standards		
STATUS:	Current	Current		
APPLICABILITY:		ALL OLHCHH Grants and Cooperative Agreements Fiscal Year 2015 to Current		
RELATED FEDERAL REGULATIONS:	§ 200.3 OMB guidelin part 18 Federal Acqui OLHCHH Po	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 OHHLHC'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
Reference

Procurement Type Reference OLHCHH Policy 2017-04 Procurement Types GRANTEE MUST SUBMIT THESE DOCUMENTS RELATED TO THE PROCUREMENT TYPE USED	Blanket Purchase Agreement (BPA) Small (Threshold is 150,000)	Blanket Purchase Agreement (BPA) Large (Threshold is above 150,000)	Small Purchase Procedures (Threshold is 150,000 total or less)	Sealed Bids	Competitive Proposals	Non-Competitive Proposals/ Sole Source
Local Procurement Policy (if not already on file)						*
Invitation for Bids		✓		✓		
Request for Quotes (RFQ)	√		✓		√	
Request for Proposals (RFP)		1		~	√	
Evaluation Method	✓	✓	✓	✓	✓	
Selection Criteria	✓	✓	✓	✓	✓	
Bid Sheet Summary	✓	✓	✓	✓	✓	
Draft or actual Contract/Agreement with Award Amounts	Overall BPA Scope and Limitations of use	*	√	√	√	V

QUESTIONS???