




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

OFFICE OF LEAD HAZARD CONTROL
AND HEALTHY HOMES

September 24, 2020

MEMORANDUM FOR: Office of Lead Hazard Control and Healthy Homes Grantees

FROM: Michelle M. Miller, Deputy Director 
Office of Lead Hazard Control and Healthy Homes

SUBJECT: **Extending Lead Risk Assessment Applicability
during the COVID-19 Pandemic**

The Office of Lead Hazard Control and Healthy Homes (OLHCHH) is issuing this memorandum as an addendum to its Policy Guidance 2013-01, *Conducting Lead-Based Paint Inspections and Risk Assessments for Lead-Based Paint and Lead-Based Paint Hazards*,¹ which says, in item 8, that,

“Risk assessments used (along with lead-based paint inspections) as part of scoping the work are valid for no more than 12 months from the date completed. However, the OHHLHC strongly recommends that risk assessments be conducted within six months before the hazard control work because the results are more current and more accurate.”

This addendum covers business disruptions from the national emergency concerning the coronavirus 2019 disease (COVID-19),² a highly contagious respiratory disease caused by the severe acute respiratory syndrome coronavirus 2 virus. It furthers the OLHCHH’s facilitating the work of grantees to make homes safe and healthy for residents, such as through its issuing Policy Guidance 2020-01, *Pandemic-Related Income Verification Applicability Extension*.³

Until further notice, if a home or residential property that your program has enrolled for performing lead hazard control work, had a lead risk assessment⁴ completed more than 12 months⁵ before the lead hazard control work is scheduled to be conducted, you should attempt to obtain a new or updated risk assessment. If pandemic-related business conditions – such as the

¹ https://www.hud.gov/sites/documents/PGI_2013-01.pdf.

² Proclamation on Declaring a National Emergency Concerning the Novel Coronavirus Disease (COVID-19) Outbreak. March 13, 2020. <https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/>.

³ https://www.hud.gov/sites/dfiles/HH/documents/PG_2020-01_Pandemic-Related_Income_Verification_Applicability_Extension%20-%20Copy.pdf.

⁴ For information on risk assessments, see the Policy Guidance above and the references cited there.

⁵ See footnote 12 of the Policy Guidance above, for the detailed meaning of “no more than 12 months” in this risk assessment context.

unavailability of risk assessment firms in the area of the home or residential property to conduct lead risk assessments of target housing, when, before the pandemic, such firms were available – make obtaining a new or updated risk assessment infeasible and you still wish to conduct the lead hazard control work in the home, you must contact your grant’s Government Technical Representative (GTR) to request authorization to use the earlier risk assessment before any lead hazard control work is contracted for or begun. In your request, you must describe the situation and the degree of diligence of your efforts to obtain a new or updated risk assessment in detail.

If you wish more information, please contact your GTR.