

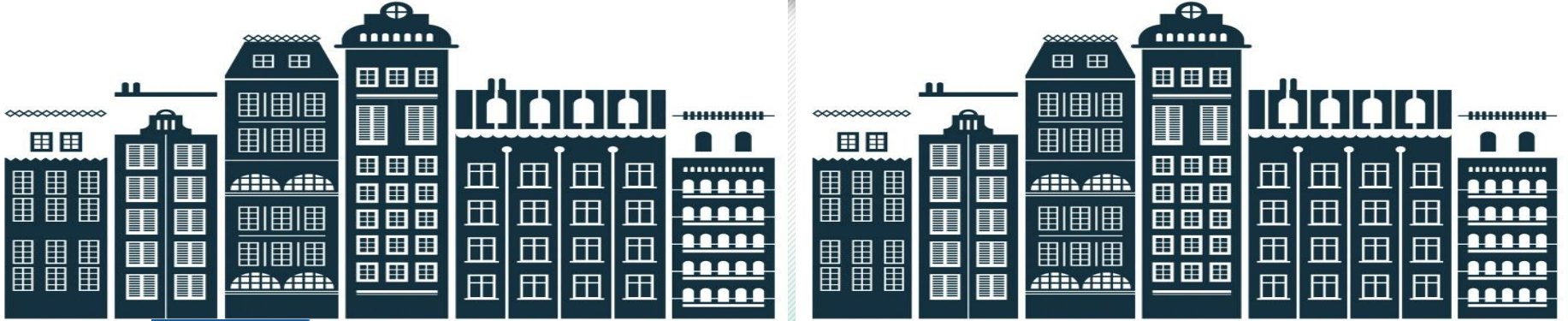
U.S. Department of Housing and Urban Development (HUD)
Office of Lead Hazard Control and Healthy Homes (OLHCHH)

FY2021 NEW GRANTEE ORIENTATION

Unit Eligibility

Eileen Carroll and Aaron Mitchell

Government Technical Representatives



VIRTUAL CONFERENCE, MAY 3RD - JUNE 18TH, 2021

Unit Eligibility

First things to look for

- ✓ *Construction Year*
- ✓ *Unit Type*
- ✓ *Occupancy: child under 6 residing or spending significant time; pregnant woman.*
- ✓ *Resident Income Eligibility: At or below 80% median income*
- ✓ *Lead-Paint Hazards*

Determining Unit Eligibility

- ✓ **Construction: Must be Pre-1978**
 - *check local Assessor or tax website*
- ✓ **Unit Type:**
 - *Single family (owner-Occupied or rental)*
 - *Multi-family*
- ✓ **Privately Owned Units Only- NO project based or public assisted units!**
- ✓ **Residents of owner-occupied and rental must meet income eligibility, and you must have income verification to document.**
- ✓ **Rentals made available to low-income families with children under 6.**
- ✓ **Vacant units must be marketed as lead safe, ideal for families with children under age 6.**

Determining Eligibility, cont'd

Owner-Occupied:

- ✓ *Must be primary residence of families with income at or below 80% Area Medium Income*
- ✓ *Not less than 90% of Owner-Occupied units assisted must be occupied by a child under age 6 – includes visiting child who spends significant amount of time” which is defined as at least three hours per day on two separate days in a week (six hours per week total), and at least 60 hours total per calendar year.*

Determining Unit Eligibility

Rental:

- ✓ *Tenants must meet income requirements:*
 - *At least 50% units must be less than 50% AMI*
 - *Remaining units must be less than 80% AMI*
- ✓ *Must remain affordable for a minimum of 3 years following the completion of lead abatement activities*
- ✓ *Marketed to families with a child under the age of six years, with preference given to these families- Program Responsibility to show this in contract and monitoring documents*

Vacant:

- ✓ *Must be marketed to low-income families with children under age 6 and remain affordable for 3 years*
- ✓ *Do not overload your unit production with vacant units*

Determining Unit Eligibility

Occupancy:

- ✓ *Occupied by a child under age 6*
- ✓ *Frequently visited by a child under age 6*
- ✓ *Pregnant woman*
- ✓ *The presence of a qualifying child at the time of assistance is not required in rental housing*

Note: Zero Bedrooms are different they have their own policy!!

Prioritization of Units

Prioritization of units should be clearly defined in your Policies & Procedures and Work Plan.

Priority should be given to units where:

- *An EBL child resides*
- *A child under 6 years old is in residence*
- *A child under 6 years old spends a “significant amount of time” 3, or*
- *A pregnant woman resides*

Eligibility of Units for Assistance

Table Located in Policy Guidance PGI 2014-01

Occupant Type	Income Level ²	Child Occupant <6 years old
Renter	<ol style="list-style-type: none"> At least 50% units must be less than 50% AMI, and Remaining units (<50%) must be less than 80% AMI 	<ol style="list-style-type: none"> Not required at time of assistance Property owner must give priority to families with child under 6 years old for at least 3 years.
Multifamily Renter (≥ 5 units in same property)	<ol style="list-style-type: none"> 20% of total number of units in same building may exceed 80% AMI Remaining units must meet renter income requirements above 	<ol style="list-style-type: none"> Not required at time of assistance Property owner must give priority to families with child under 6 years old for at least 3 years.
Owner (primary residence)	100% of owner-occupied units must be occupied by families with less than 80% AMI	<ol style="list-style-type: none"> At least 90% of total number of owner-occupied units assisted must have: <ul style="list-style-type: none"> A child under 6 years old in residence, or A child under 6 years old spends a “significant amount of time”³ or A pregnant woman Less than 10% of total number of units assisted may be occupied by families without a child

Zero Bedroom

- ✓ *PGI 2017-03 0-Bedroom Pre 1978 Units with a child under 6*
- ✓ *Child under six must reside or expected to reside in the unit*
- ✓ *“Expected to reside” means actual knowledge of residency or expected residency (includes woman known to be pregnant. In cases of future move-in, a signed lease is required and must be part of the case file documents.)*

Income Eligibility

- ✓ *Resident's must meet the guidelines of at or below 80% median income.*
- ✓ *Income of all occupants 18 years and older must be included.*
- ✓ *Use documentation required by the income eligibility method chosen by your program.*
- ✓ *Income must be re-verified if unit is not completed within 6 months initial application.*
 - *NOTE: GTR may consider extension requests based on PGI 2020-01 Pandemic-Related Income Verification Applicability Extension*

Lead Paint Hazards

If unit meets construction, occupancy, and income eligibility requirements, it must also have lead-based paint hazards identified through:

- ✓ *A Tier II Environmental Review*
- ✓ *A complete Lead Inspection/Risk Assessment LIRA which includes a lead paint inspection with XRF and a Risk Assessment identifying the lead paint hazards and providing suggested methods to eliminate the hazard either through abatement or interim controls.*
 - *NOTE: LIRA expires after 1 year and must be updated with new dust sampling.*

CASE EXAMPLE 1

*Unit: Pre-1978, child with EBL, Household income over 80%:
Can the unit receive grant funds for lead hazard control? No,
even with a lead-poisoned child.*

Possible Solution:

- ✓ Refer owner to HUD approved Housing Counselor to see if they qualify for a HUD 203K loan*
- ✓ If in rural area, refer to local USDA Single Family Loan Program*
- ✓ Suggest owner reapply if income changes*
- ✓ Recommend the owner complete RRP training in the event they decide to do some of the work themselves.*

CASE EXAMPLE 2

Application approved 1/20/2021

Due to delay, hazard control work not scheduled to begin until 10/1/2021

Action Required: Income must be recertified.

Recertification shows unit is now over income. Can work proceed? No, Owner must meet income guidelines at time of assistance.

RESOURCES

- ✓ **NOFA**
- ✓ **PG 2017-03, *Treatment of 0-Bedroom Pre-1978 Units***
- ✓ **PG 2014-01, *Eligibility of Units for Assistance***
- ✓ **PG 2013-07, *Income Verification Guidance***
- ✓ **PG 2013-05 *Use of LHC funds in non-target housing and other prohibited activities***
- ✓ **PG 2012-02 *Enrolling Previously Assisted Units***