### Lead Based Paint Capital Fund (LBPCF) Notice of Funding Availability (NOFA) Frequently Asked Questions

Applications due November 2, 2020

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### How to Apply

### 1. Where can I find the published Notice of Funding Availability (NOFA)?

The published NOFA is available at: <u>https://www.hud.gov/sites/dfiles/SPM/documents/LBPCF\_FR-6400-N-42.pdf</u>

You may also search for the NOFA on Grants.gov: https://www.grants.gov/web/grants/search-grants.html?keywords=Lead-based%20paint

### 2. What is the maximum award to a public housing authority (PHA) for this grant?

A PHA may receive a maximum award of \$5 million.

#### 3. Does the application download include Form HUD-50075.1 Parts I and II?

The HUD form can be created in HUD's Energy and Performance Information Center (<u>EPIC</u>), and found by visiting the Forms Library in HUD's Client Information Policy System (HUDCLIPS) at <u>https://www.hud.gov/hudclips</u>. If using EPIC, you can print to PDF and upload a copy. Use of EPIC will save a step if awarded, as the Annual Statement/Budget must be submitted via the system. Only authorized PHA staff have access to EPIC.

### 3. Will the application require an additional narrative to the form HUD-50075.1, *Annual Statement/Performance and Evaluation Report*?

Narrative should only be submitted to describe Other Factors: Section 3, Opportunity Zones, Historically Black Colleges or Universities (HBCUs), and/or Promise Zones (if applicable) and shall not exceed 2 (two) pages, double-spaced 12 point font. The description of the planned work should only be included in the submitted form HUD-50075.1.

### 4. Is a PHA under monitorship is still eligible for this grant?

Yes. PHAs that are under federal monitorship have always been eligible, but this NOFA does not include a restriction for use of funds under receivership or the oversight of a federal monitor, and use of funds at properties subject to enforcement under the Lead Disclosure Rule and/or the Lead Safe Housing Rule. PHAs that are designated as Troubled are eligible for funding if the agency is in compliance with any current Memorandum of Agreement or Recovery Agreement.

### 5. May a PHA be eligible if it already has an existing/open LBPCF Grant?

Yes, provided the requested funds are not for activities funded in a prior application. See Section VI.A., Adjustments to Funding. For example, applicants can apply for work at the same property provided they are not performing the same work in the same units. If working at the same property, for example, applicants can update a prior risk assessment if it is over one year old, upgrade prior work performed from interim controls to abatement, and/or complete units, common areas or exterior surfaces that were not completed under the previous grant.

### 6. Can we presume LBP Hazards are present due to construction date or does the PHA have to have its LBP Risk Assessment done prior?

HUD regulations at 24 CFR 35.120 allow PHAs the option to presume that lead-based paint or lead-based paint hazards or both are present throughout a residential property. There is no requirement to have a lead-based paint evaluation or risk assessment prior to applying for these funds. Once awarded, the PHA should use available funds to perform lead evaluations so that hazard control is directed to priority areas.

### 7. Can you go into more detail about how to use EPIC when applying?

Form HUD-50075.1 Parts I and II Annual Statement/Performance and Evaluation Report, Capital Fund Program must be completed as part of the application. This form may be prepared in HUD's Energy and Performance Information Center (EPIC) by authorized PHA users, printed or saved to PDF, and included in the application. It should be noted though that EPIC will only allow PHAs to add work activities from an approved 5 Year Action Plan to be included on the Form HUD-50075.1 Parts I and II Annual Statement/Performance and Evaluation Report. If the activities to be completed under the proposed lead based paint grant are not currently in an approved 5 Year Action Plan in EPIC, the PHA will either have to revise its 5 Year Action Plan in EPIC to include the activities and get the Plan approved or alternatively use the Form HUD-50075.1 from HUDCLIPS.

8. Can a PHA that only administers Section 8 Housing Choice Vouchers (HCV), Project Based Rental Assistance (PBRA), or Project Based Vouchers (PBV) apply for funds under this NOFA?

No. The funds under this NOFA are designated for identifying and eliminating lead-based paint hazards in public housing (i.e. units assisted pursuant to Section 9 of the United States Housing Act of 1937) only.

9. Can individuals, nonprofits, resident associations, tribes or tribally designated housing entities apply for this grant?

No. Only PHAs are eligible. See section III.A. Eligible Applicants of the NOFA.

#### 10. How many applications can a PHA submit?

One. A PHA may submit only one application but the request may be for more than one project (i.e., more than one development in the Inventory Management System/Public and Indian Housing Information Center (IMS/PIC)).

### 11. Are developments that have converted under the Rental Assistance Demonstration (RAD) eligible for this grant?

No. Properties that have been converted under RAD are no longer considered public housing, as they have converted to the project-based voucher (PBV) or project-based rental assistance (PBRA) program.

## 12. Is a PHA still eligible to receive a grant award for a building that is under a Commitment to enter into a Housing Assistance Payment (CHAP) since the time of submission?

No. Funds cannot be used for projects with active CHAPs. If an applicant is awarded grant funds and also has an active CHAP, the applicant will be required to withdraw the CHAP or refuse the grant award.

# 13. The guidance says that funds may not be used at projects under CHAPs. Is it possible to make an application for a development that we intend to place under a CHAP in the future - as long as the work is completed before the CHAPs are in place?

It is allowable to use these funds on public housing properties that are not yet under a CHAP. The intent of this NOFA, however, is to provide funds for lead hazard evaluation and abatement or hazard control in public housing managed by public housing authorities. Owners participating in the PBV and PBRA programs have different requirements for lead-based paint evaluation and hazard control.

#### 14. Can funds be used for work at multiple properties?

Yes. Funds can be used for work at multiple properties. Each property should be identified in Part II of form HUD-50075.1. All projects must meet the eligibility requirements in accordance with the NOFA.

### 15. Does form HUD- 2880, *Applicant/Recipient Disclosure/Update Report*, need to identify all projects where grant funds will be used?

No. Part II of form HUD-50075.1 includes separate columns that will capture each project (i.e., IMS/PIC development) number and name and work to be performed at each project.

#### 16. Does the application require a scope of work evaluation?

No. Applicants do not need to submit a lead-based paint evaluation or hazard/abatement scope of work as part of the application.

- **17.** Can a PHA submit an application that includes inspections that have already started?
- No. A PHA may not apply for funds for work already performed.
  - 18. If a PHA proposes activities with costs exceeding the maximum grant amount of \$5 million but will use other funds to make up the difference between the maximum grant amount and the total cost, how should this be recorded on form SF-424?

In this case, the applicant should list \$5 million on line 18a of the SF-424, and any other funds on lines 18b-18f.

**19.** We would like to request the maximum amount of \$5,000,000. Would HUD approve a lesser amount if funds are not available or should we submit a lower amount?

As stated in Part V of the NOFA, Application Review Information, applications will be ranked in order of total score and funded in order of rank, subject to funding availability. Under the NOFA, HUD reserved the right to only partially fund applications based on the selection information above. Therefore, the last applicant to be funded based on the ranking may receive only a portion of the requested amount, based on remaining funds available.

#### 20. Are there any fair housing forms to be submitted with the application?

The required forms are identified in the NOFA package at: <u>https://www.grants.gov/web/grants/search-grants.html?keywords=Lead-based%20paint</u>

### **Eligible Activities**

#### 21. What are the eligible activities under this NOFA?

This program provides competitive grants to PHAs to evaluate and reduce lead-based paint hazards in public housing by carrying out the activities of risk assessments, abatement, and interim controls in target housing (as those terms are defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851b), or Title X).

#### 22. Can the PHA hire extra maintenance personnel with funds from this NOFA?

No. Salaries and benefits for persons not directly performing lead-based paint hazard control, evaluations, or project management are not eligible costs under this grant because they are indirect costs. They are not used to directly perform abatement, inspections, or assessments. However, they do indirectly support these functions.

### 23. Does this grant allow the PHA to hire extra administration personnel to assist with paperwork?

No. <u>LBPCF grant funds can only be used for the activities of lead-based paint risk</u> <u>assessments, inspections, abatement, interim controls, and clearance examinations and not for</u> <u>any additional administrative work related to the grant. For extra work whether administrative</u> <u>or needed modernization, such as</u> work in the property, including work to prepare for lead hazard control (e.g., repairs to the substrate, fixing leaks or other renovations) shall be funded by other sources such as annual Capital Fund grants. Please see NOFA Part F. Funding Restrictions.

### 24. May LBPCF grant funds be used on other lead components besides paint such as lead pipes or lead poly coating on wood floors?

*These funds are only for lead-based paint and lead-based paint hazards as defined in 24 CFR 35.110.* 

### 25. Does it cover for lead in soil or water?

No. Water sampling is generally not performed in a routine risk assessment unless there is a specific risk identified by the Risk Assessor. The funds for this program are designated for the evaluation and control of lead-based paint and lead-based paint hazards. These funds cannot be used to mitigate a water hazard (ex. replacement of pipes and/or fixtures).

Lead in soil is included in the definition of lead-based paint hazard at 24 CFR 35.110.

### 26. Does the Risk Assessor need to be EPA certified?

The answer varies by state. All persons performing lead-based paint evaluations or hazard control must be currently certified for the work they do in the state where the work will be performed. Most states have an EPA-authorized lead-based paint activities certification program covering individuals conducting lead-based paint activities, typically, lead-based paint inspection, lead risk assessment, lead abatement worker, and lead abatement supervisor. Most states also require the firms that employ or hire the certified individuals that conduct the lead-based paint activity to be certified. In the remaining states, certification is obtained from the EPA Regional Office's lead program. For more information, see www.epa.gov/lead

### 27. Do risk assessments need to be conducted by a third party?

No. The NOFA only requires that clearance examinations be conducted by a third-party organization. Lead evaluations and clearance examinations must be performed by persons or entities independent of the lead hazard control firm, unless the PHA uses in-house employees certified as lead inspectors and then uses certified risk assessors to conduct the evaluations or clearance.

#### 28. Can Lead-Based Capital Fund Program awards be used to cover relocation costs?

Yes. Follow <u>the HUD Guidelines for the Evaluation and Control of Lead-based Paint Hazards in</u> <u>Housing</u>, Chapter 8 for guidance on when relocation is required.

#### 29. Can Lead-Based Capital Fund Program awards be used to purchase equipment?

LBPCF grant funds can be used to purchase equipment such an XRF machine but cannot be used for additional ongoing costs such as user training, periodic state or EPA certifications, or registration of the nuclear source (if applicable). Those additional ongoing expenses must be paid for with Operating Funds or another eligible source.

### 30. Does the LBPCF grant allow for asbestos testing and abatement work?

No, funds are for lead-based paint and lead-based paint hazards only. See Section IV, Application and Submission Information, part F, Funding Restrictions.

### **31.** Is screening related equipment like cameras and air quality meters an allowable cost?

No. Lead-based paint evaluations as described in <u>the HUD Guidelines for the Evaluation and</u> <u>Control of Lead-based Paint Hazards in Housing</u> Chapter 5 (Risk Assessment) and Chapter 7 (Inspection) do not include the use of cameras and air quality meters.

### Application Evaluation

### 32. Will a small housing authority be able to be competitive with this grant?

Yes, application scores are based on Rating Factors 1, 2, & 3 and do not account for the size of the Housing Authority. Further, scoring for Rating Factor 1 is a weighted average based on all properties in the IMS/PIC Development/AMP proposed for award.. To check your agency's potential score, review <u>Tenant Data and Property Age Data for the FY 2020 Lead-Based Paint</u> Capital Fund NOFA (data as of 9/1/2020).

## 33. Since the <u>Excel worksheet</u> was produced for construction dates as of July 31, 2020, we have entered our construction dates. Is there a way to re-calculate the unit - weighted average calendar year of construction?

All applications will be evaluated with the information as of the NOFA closing date. Any construction dates entered and/or updated after the July 31, 2020 posting will be included in the final unit-weighted Average Calendar Year of Construction. Our office will post the Tenant Data and Property Age Data for the FY 2020 LBPCF NOFA after the NOFA closing date on the <u>Office of Capital Improvements</u> website.

### 34. Can you apply for only a portion of properties in an AMP?

Applications are scored for the IMS/PIC Development(s)/AMP(s), but funds can be targeted for specific buildings or units. Scoring under Rating Factor 1 will be based on the entire IMS/PIC Development(s)/AMP(s). To check your potential score, review <u>Tenant Data and Property Age</u> Data for the FY 2020 Lead-Based Paint Capital Fund NOFA (data as of 9/1/2020). This

*information will be updated as of the closing date of the NOFA and posted on the <u>Office of</u> <u>Capital Improvements</u> website.* 

### **35.** Can you apply for this grant for scattered sites? And if so, how do you determine the property construction date?

Applications are scored for the IMS/PIC Development(s)/AMP(s), but funds can be targeted for specific buildings or units. Scoring for Rating Factor 1 is a weighted average based on all properties in the IMS/PIC Development/AMP proposed for award. To check your potential score, review <u>Tenant Data and Property Age Data for the FY 2020 Lead-Based Paint Capital Fund</u> (data as of 9/1/2020).

### **36.** How will HUD confirm that properties are occupied by at least one family with a child under the age of six?

HUD will extract data from form HUD-50058, Family Report, submitted by the PHA in IMS/PIC to determine that each property has at least one family with a child under age six at the time of application. It is not required that there be a child under six in every unit. HUD will award points under Rating Factor 1 based on the portion or percentage of units occupied by families with young children in the properties as of the application due date.

### **37.** Can applications be submitted for properties with senior residents who are regularly visited by grandchildren under the age of six?

Children must be included on the form HUD-50058, Family Report, to be counted as eligible.

### **38.** How can I complete the 50075.1 in EPIC and then include it in my NOFA application submission?

PHAs wishing to create their Annual Statement/Budget (50075.1) in EPIC would first create a 5-Year Action Plan in EPIC including the lead-based paint activities they are proposing or revise their EPIC 5-Year Action Plan to include these activities and then obtain Field Office approval of the plan. Once the plan has received Field Office approval in EPIC, the PHA would create an Annual Statement/Budget in EPIC that includes the lead-based paint activities. The EPIC system will automatically enforce the 1,000-character limit.

After creating the Annual Statement/Budget in EPIC, the PHA would then export a PDF to attach to their application in Grants.gov by selecting the Activity Planning (CFP grant planning) Module of EPIC, selecting the Annual Statement/Budget/P&E link, selecting the View Statements link next to the appropriate Annual Statement/Budget, selecting the View PDF link, and saving the PDF to the location of their choice to then submit with their NOFA application. The review of the 50075.1 will be based on Part II of the form.

PHAs should note that the application deadline will not be extended based on any technical issues they may encounter in EPIC. PHAs may create their 50075.1 on paper in lieu of creating this document in EPIC.

## **39.** As an outside Consultant, am I allowed to access EPIC to complete the 50075.1 for a Housing Authority within the system. If so, does the Housing Authority provide me with a user name and password, or do I get that from HUD?

Public Housing Authorities (PHAs) are responsible for deciding who should have access to their PHA's information in EPIC and for the accuracy of the information submitted in EPIC. A PHA may request that EPIC access be granted to consultants working on their behalf.

Obtaining EPIC access is a multi-step process that also requires a HUD Secure Systems account. Instructions for obtaining access are available at: <u>https://portalapps.hud.gov/app\_epic/</u>. PHAs should note that the application deadline will not be extended based on an inability to timely obtain EPIC access for a staff member or consultant. PHAs may create their 50075.1 on paper in lieu of creating this document in EPIC.

## 40. The NOFA indicates that HUD will score each application on average property age based on construction dates in IMS/PIC. How can PHAs ensure that their IMS/PIC construction date information is accurate?

HUD will score average property age based on the construction dates at the building-entrance level in the IMS/PIC system. HUD posted preliminary IMS/PIC data as of the end of July on the Office of Capital Improvements (OCI) homepage at: https://www.hud.gov/program\_offices/public\_indian\_housing/programs/ph/capfund.

PHAs may wish to use this preliminary data to evaluate which of their developments may meet certain threshold requirements as of the submission deadline, to identify the need for data corrections in IMS/PIC, and to consider how inclusion of various developments in their application may impact scoring.

Note that a significant proportion of the building-entrance level construction dates are missing or appear to be erroneous in IMS/PIC. <u>It is very important that PHAs confirm that the</u> <u>construction dates have been entered and are accurate in IMS/PIC for all buildings in all</u> <u>developments proposed in the application, and that PHAs enter changes in IMS/PIC in the</u> <u>case of omissions or errors.</u> HUD reserves the right to require successful applicants to confirm construction dates following award, and may rescind awards made under this NOFA in the case of erroneous construction dates. Construction dates are defined in the IMS/PIC user manual for the Development sub-module as the date the building entrance finished construction.

PHA staff with the appropriate access to the IMS/PIC system may confirm the construction dates by running a Building Detail Report in IMS/PIC. To do so, a user should log in to IMS/PIC and select the Development sub-module on the left. Then, the user should select the Reports tab. Under the Reports tab, the first sub-tab is for Building Reports. On this screen (depicted in Figure 1, below), the user may select one or more developments, change the Building Status in the dropdown box to "All", and select the radio button marking the "Detailed" report type. Upon then selecting Generate Report, the user will see a listing of buildings along with construction dates and other information. This information may be exported to Microsoft Excel via the Download in Excel link at the top right.



Figure 1: Building Reports page in IMS/PIC

Any changes to construction dates should be entered in IMS/PIC by navigating to the Building tab and Building List sub-tab within the Development sub-module. On that screen (depicted in Figure 2, below), users may select the link on a building number to view the Building Detail screen (depicted in Figure 3, below). Here the user may change the Construction Date and select Save. PHAs should confirm that their changes registered in the system. Note that PHAs may not change construction dates for building-entrances for which the units have been removed from inventory, and PHAs will need to coordinate with HUD's Special Applications Center if changes are needed for units that are in a submitted or approved inventory removal application.

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	HQ Office:	Public a	and Indian Housing	9					
PIC Main	HQ Division:	PO Fiel	d Operations						
Housing	Hub:	4HBIR I	Birmingham Hub						
Agency	Field Office:	4CPH B	IRMINGHAM HUB	OFFICE					
Development	Field Office HA:								
Inventory Removals	Physical Development:								
Logoff	Building Search								
Logon	Building Number:								
	Entrance Number:								
		Search							
	Building Information								
								Add	Building
	Buildings 1 to 50 of 61								1
	Building Building No. Entrance No.	Building Name	Building Type	Building Status Type	Address Line 1	Floor Count	Unit Count	Construction Date	Delete Building
	1		Non Dwelling Structure	Initial Approval Completed		1	0	06/01/1952	
	<u>106</u> 1		Semi Detached (Sep. entrances)	Initial Approval Completed		1	1	06/01/1952	

Figure 2: Building List Page in IMS/PIC

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	Development Building	Unit Submission Approval		
pic	Building List	Building Detail		
	HQ Office:	Public and Indian Housing		
PIC Main	HQ Division:	PO Field Operations		
Housing	Hub: Field Office:	4HBIR Birmingham Hub 4CPH BIRMINGHAM HUB OFFICE		
Agency	Field Office HA:	4CPH BIRMINGHAM HOB OFFICE		
Development	Physical Development:			
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	Building Entrance Address			
	Address Line 1:	*	Address Line 2:	
	City:	•	County:	•
	State:	Alabama 🗸 *	Zip Code:	
	Building Entrance Details			
	Building Type:	Non Dwelling Structure	✓* Select	
	Building Status Type:	Initial Approval Completed		
	AMP Group Number:			
	Floor Count:	1		
	Total Units Count:	0		
	Construction Date:	M/DD/YYYY		
	Comments:			
				Save

Figure 3: Building Detail Page in IMS/PIC

Any changes to construction dates must be followed by a building and unit submission and approval process to properly record the changes. PHAs users submit the building and unit data for approval on the Submit Unit Information sub-tab under the Submission tab of the IMS/PIC Development sub-module. On this page, the user would enter any comments, select Save to record the comments, and select the Submit Data for Approval button. The PHA would need to ensure approval by their local Field Office.

Reports         Maintain Inventory         CAPFUND B&U Certification           Development         Puilding         Unit         Submission         Approval           Submit Unit Information         Submit Unit Status Changes		
Submission Comments	Ĵ	
All changes are subject to approval by Field Office personnel.		Submit Data For Approval Save

Figure 4: Submit Unit Information Page in IMS/PIC

In order for any updates to construction dates to be reflected in the scoring of average property age, the process described above must be completed by the application deadline.

41. The NOFA indicates that HUD will score each application on the portion of units occupied by at least one child under age six. Can you explain how these scores will be calculated and how PHAs can ensure that their IMS/PIC occupancy information is accurate?

HUD will construct this percentage by counting the total number of units occupied by at least one child under age six in all of the IMS/PIC developments proposed for funding in the application and dividing by the total number of standing ACC units in those developments. This information will be based on IMS/PIC data as of the application deadline of March 14, 2019. A unit will be deemed occupied by at least one child under age six if the date of birth for any household member as reported on the HUD Form-50058 is less than March 14, 2013.

PHAs should ensure that their tenant information reporting is complete in IMS/PIC in advance of the application deadline, including timely reporting all new admissions and end of participation 50058 records that may impact this scoring. HUD posted a snapshot of this data on the Office of Capital Improvements homepage at the link below so that applicants may review preliminary data prior to the application due date.

https://www.hud.gov/program\_offices/public\_indian\_housing/programs/ph/capfund

PHAs should ensure that at least one unit is occupied by a child under age six in each IMS/PIC development proposed in the application.

PHA staff with the appropriate access to the IMS/PIC system may run a Resident Characteristics Report in IMS/PIC to achieve a better understanding of the composition of the households they serve. To do so, a user should log in to IMS/PIC and select the Reports sub-module within the Form 50058 module on the left. The user may need to select "Agree" when the Privacy Act Statement and Compliance Notice displays. The user would then select the RCR tab to view the RCR Query page (depicted in Figure 5, below). On this page, the user would select a Program Type of Public Housing in the drop-down box and select the link to run the report at the Public Housing Agency level; the user would follow any prompts that may be displayed to generate the report.

RCR       Rent Calc       HQ S       SEMAP       New Adm       Rent & Income         Delinquency       Reexam       Decon       KMI       EOP       Mob & Port       Budget         RCR Query         Resident Characteristics Report         Select Program Type:       Public Housing
RCR Query Resident Characteristics Report
$\frown$
alast Program Typer Public Housing
elect Program Type: Tubic Housing
Select Level of Information: National
State
Field Office Metropolitan Area
County
City or Locality Public Housing Agency
Congressional District
F

Figure 5: RCR Query Page in IMS/PIC

On the Resident Characteristics Report that displays, users should select the Household tab to view a table displaying the distribution of household members age as a percentage of the total number of household members, including a category displaying information on members aged 0-5 years (depicted in Figure 6, below). The figures for the PHA will be displayed alongside a comparison group. Users should not expect the information displayed in the Resident Characteristics Report to exactly match the information that HUD extracts from IMS/PIC and uses to score applications under this NOFA, as the Resident Characteristics Report contains different logic than the specifications for scoring this factor described in the NOFA. Users may, however, gain a more general picture of household composition by viewing this report.

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Program type : Public Housing								85	4	à	
Level of Information : Housing Agency within Field Office 4CPH							Download i	in Excel	Print Page	View Entire Rep	
Effective Dates Include	d : Nov	ember 0	1, 2016	through	Februa	ary 28, 2	018				
Units Income Distribution by Household .		Age as a %		Number o		old Memb					
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4CPH	12,369		Count 17,474		23,892				Count 7.050	Percent 10	Count Percer 713

Figure 6: Resident Characteristics Report in IMS/PIC

## 42. In the case of multiple buildings included under a single IMS/PIC development number, can some buildings be included in the application and other buildings excluded?

Applications by their nature are at the IMS/PIC development level, as this is how the 50075.1 is constructed. PHAs are permitted to target grant activities at less than the whole development, but that will not impact the processing of their application or their score.

43. The NOFA states that eligible properties may include playgrounds or child-care centers that are part of the public housing project. Will "community centers/management offices" also be considered as eligible if they are part of the public housing project? My PHA is working towards obtaining a "lead free" site certification and lead based paint abatement related work is required on the Community Building to obtain this certification. Please advise if this property would be eligible?

Section III, Eligibility Information, part Fof the NOFA refers to the types of properties eligible for funding. See Section IV, Application and Submission Information, part F, Funding Restrictions, for information about eligible uses of funds.

This NOFA does not encourage PHAs to render properties lead-based paint free. Full removal of all lead-based paint can be prohibitively expensive and exhaust funds available under the grant. For guidance on which areas should receive lead-based paint abatement or hazard control, PHAs should defer to the recommendation of a certified Lead-Based Paint Risk Assessor. Risk assessments performed in accordance with Chapter 5 of the HUD Guidelines (Risk Assessment) will consider where children live and play in the recommendations for lead-hazard control methods and locations.

### 44. If HUD does not receive enough applications scoring 60 points or more, would consideration be given to lowering the funding threshold?

HUD cannot fund applicants under this NOFA that do not receive at least 60 points. See Section V.B.2; these applications would be deemed ineligible for funding.

If you have questions or feedback about this program, you can reach the Lead-based Paint Capital Fund team through <u>PIHOCI@hud.gov</u>.

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