

# Blood Lead Levels in Children

#### Update for Owners of Project-Based Voucher Units

In February 2017, the U.S. Department of Housing and Urban Development (HUD) issued new guidelines for addressing lead hazards in federally-assisted target housing. The guidelines include new, lower thresholds for when public housing authorities (PHAs) and housing owners must take action if a child under age six in federally-assisted housing built before 1978 has an elevated blood lead level (EBLL). *This fact sheet summarizes your federal responsibilities as an owner in responding to an EBLL in your property and the resources available to you.* 

#### Understanding your PHA's role

Your PHA is responsible for monitoring your compliance with these steps. Additionally, on many steps, you may collaborate with the PHA to allow them to directly assist you in executing a task. Discuss possibilities for collaboration with your PHA.

#### Trust the experts!

A certified lead-based paint abatement or renovation firm will have expertise in all aspects of relocation, control, and clearance. Follow their guidance.

## Locating certified assessors

Contact your state lead licensing agency or visit <u>www.epa.gov/lead</u> to find a certified assessor.

## EBLL case reported for a child under age six in your property... What steps do you need to take?



Immediately **verify** the EBLL with a health care provider or your public health department and keep records of your attempts at verification. Owners may be made aware of EBLLs by health care providers, the family, local health department, or PHA. *The PHA may be able to assist you with verification procedures*.



**Notify** your local HUD Field Office, LeadRegulations@hud.gov, and local health department within five business days of receiving verified EBLL report. *The PHA may be able to assist you with these notifications.* 



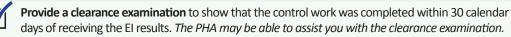
Ensure that a certified Lead-Based Paint Risk Assessor performs an **environmental investigation (EI)** in the child's home and common areas within 15 calendar days of receiving verified report. *The PHA may be able to assist you with finding certified assessors and conducting Els.* 



**Notify** your local HUD Field Office of the results of the EI within 10 business days of receiving results and the family within 15 calendar days. Also notify all building residents within 15 calendar days, if EI identified lead-based paint hazards.

## The environmental investigation revealed lead-based paint hazards in the unit... What now?

**Control** all lead-based paint hazards in the unit and common areas within 30 calendar days of receiving the EI results. Ensure that families are not exposed to lead hazards in housing as you do the control work. Use a certified lead-based paint abatement or renovation firm for the control work and clearance examination (below). Residents should follow the EI's recommendations for controlling other household sources of lead (namely, imported products).



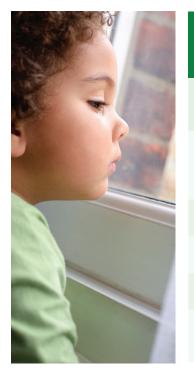
**Notify** all property residents that work is complete and of any hazard reduction activities undertaken within 15 calendar days of completion.



**Provide documentation** to your local HUD Field Office within 10 business days of completion of control work. *The PHA may be able to assist you with HUD notification*.



If the unit is in a property with multiple federally-assisted units, see next page for additional requirements.



If the EBLL unit is in a property with multiple federally-assisted covered units and the EI reveals lead-based paint hazards, owners must investigate other assisted units in the property where a child under six lives.

Conduct a risk assessment (RA) on all or a sample of other units where a child under age six lives or is expected to live (covered units) using a certified lead-based paint risk assessor. Maintain records of the RA.

If the RA finds lead-based paint hazards, **control the hazards** within 30 calendar days of receiving the RA results. Ensure that families are not exposed to lead hazards in housing as you do the control work. Use a certified lead-based paint abatement or renovation firm, and notify all property residents of the RA results within 15 calendar days of receiving results.

**Provide a clearance examination** to show that the control work was completed within 30 calendar days of receiving the RA results. *The PHA may be able to assist you with the clearance examination.* 

**Notify** other property residents that work is complete and of any hazard reduction activities undertaken within 15 calendar days of completion.

Provide documentation to your local HUD Field Office within 10 business days of completion of control work. The PHA may be able to assist you with HUD notification.

Incorporate ongoing lead-based paint **maintenance and reevaluation** activities into regular building operations. Ensure reevaluation activities fulfill requirements based on the value of the PBV (see below).

### Frequently Asked Questions (FAQs):

- What are the consequences for noncompliance? Failure to adhere to these regulations constitutes a Housing Quality Standards (HQS) violation and a violation of the LSHR, so be sure to utilize all the resources at your disposal (the PHA, the expertise of your certified assessors, and various funding sources) in preparing to respond to EBLLs.
- How do I determine what occupant protection measures to take? Your certified assessor will determine requirements for relocation, isolation of work areas, and other worksite preparation measures. But if you doubt residents will stay out of work areas, relocate until all work is complete and cleared!
- **Do I perform RAs on all or a sample of covered units?** See the guidance table in "Lead-Based Paint Inspection" in <u>Guidelines</u>.



- What is the required timeframe for RAs? The risk assessments must be conducted within 30 calendar days of receiving results of the EI for a property with ≤ 20 other covered units, and within 60 days for a property with > 20 other covered units.
- How do I know when to reevaluate? As already required by the LSHR, if the PBV is for more than \$5,000 per unit per year, the owner must conduct periodic reevaluations every two years and respond to them. Units with identified lead-based paint hazards must have annual re-examinations for deteriorated paint and/or failed hazard control. This can be done in conjunction with periodic HQS inspections.
- Where can I find information about funding for lead-based paint testing and control? Many states and localities administer grants, tax credits, and other funding that can be used by owners for lead-based paint hazard testing and control in private market housing. Contact your PHA, public health department, or local HUD Field Office for more information.

#### **Resources for owners**

- The expertise and work plans of your certified risk assessors and abatement firms
- Notice PIH 2017-13 (Guidance on EBLL update)
- <u>Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (</u>"Guidelines")
- HUD Lead-Based Paint and Lead Hazard Reduction Demonstration Grant Programs