

Responding to EBLLs in Children under Age Six: Guidance for PHA **Project-Based Voucher** Staff

Start Here!






Indicates a required step for the PHA



Indicates an owner responsibility where the PHA may wish to directly assist the owner







EBLL case reported for a child under age six in your property... What now?

-  **Verify!** The owner must immediately verify the EBLL with a health care provider or your local public health department, if the original report did not come from one of those sources.
-  **What if no initial medical verification is received?** The PHA must attempt to verify the EBLL at least twice with the health care provider or health department. Keep records of your attempts to verify the EBLL.
-  **How will I hear about an EBLL?** PHAs can be made aware of EBLLs by health care providers, the family, or local health department.

Resources for PHA staff in navigating this process:





- The expertise and work plans of your certified risk assessors and assessment or renovation firms
- [Notice PIH 2017-13](#) (Guidance on EBLL update)
- [Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing](#) (“Guidelines”)

EBLL case verified... What now?







-  **Notify!** Owner is required to notify your local HUD Field Office, LeadRegulations@hud.gov, and local health department within five business days of receiving verified report.
-  **Investigate!** The owner must 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.
-  **What to include in email to HUD?** See [Notice PIH 2017-13](#) for specific information to include, but do not include the child’s name or test results.
-  **Where do I find a certified assessor?** Contact your state lead licensing agency or visit www.epa.gov/lead.
-  **Can my health department do the EI?** Yes, see [Guidelines](#) for further information.
-  **Monitor compliance!** PBV owners are responsible for complying with notification and response steps for a child with an EBLL, but PHAs must monitor owner compliance with the LSHR in accordance with the HAP contract. Be sure to monitor and document your owners’ actions from initial verification to ongoing maintenance, and look for opportunities to assist owners to help ensure compliance.



Results of environmental investigation received... What now?



-  **Notify!** Owner is responsible for notifying your local HUD Field Office of the results within 10 business days of receiving results and the family within 15 calendar days. Also for notifying all building residents that an EI was completed, if it identified lead-based paint hazards.
-  **Ask!** Did the EI identify lead-based paint hazards? If no, that's it! Maintain records.
-  **What to include in the notification to HUD?** The notifications must include the date the investigation was completed.
-  **How to notify other residents?** Notify other building resident by letter or notice delivered to each occupied dwelling unit. The LSHR prohibits notice of EI being posted to any centrally located common area, as it could reveal private health information.

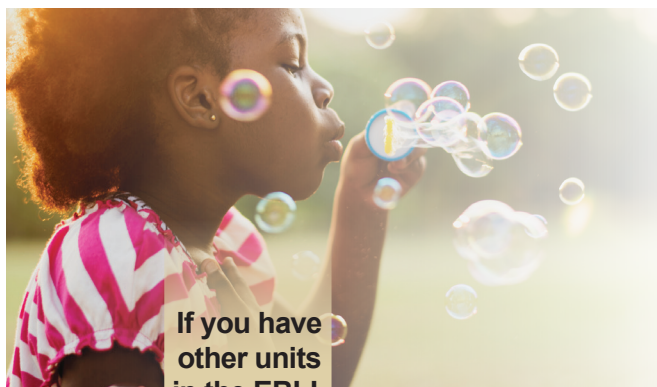
Environmental investigation identified lead-based paint hazards... What now?

-  **Ask!** Is this unit in a property with multiple federally-assisted units? If so, in addition to these steps, the owner will need to complete the steps for other covered units in the property.
-  **Clear!** The unit must pass a clearance examination in the unit and common areas within 30 calendar days of receiving the EI results. Clearance is the owner's responsibility, but the PHA may wish to assist.
-  **Notify!** Owner is responsible for notifying all building residents that work is complete and of any hazard reduction activities undertaken. Provide documentation to your local HUD Field Office within 10 business days of completion of clearance.
-  **How to navigate these control steps:** A certified lead-based paint abatement or renovation firm will have expertise on all aspects of relocation, control, and clearance. Follow their directions.
-  **What about non-paint hazards identified in the EI?** Residents should follow the EI's recommendations for controlling other household sources of lead (namely, imported products).
-  **When is control work complete?** Control work is not complete until the unit passes a clearance examination. See "Clearance" in [Guidelines](#).

If lead-based paint hazards were identified, the owner will be responsible for conducting any necessary control work and implementing occupant protections. Be sure to monitor these steps!

All necessary environmental investigations, risk assessments, and control work are completed... What now?

-  **Reevaluate!** The owner is responsible for ensuring that the unit continues to be lead-safe. Reevaluation requirements will vary depending on the value of the PBV.
-  **When is reevaluation required?** 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.



If you have other units in the EBLL property...

Responding to EBLLs in Children under Age Six: Other Covered Units in PBV Program






Indicates a required step for the PHA









Indicates an owner responsibility where the PHA may wish to directly assist the owner

An environmental investigation revealed the index unit in your multi-unit property has lead-based paint hazards... What now?



-  **Assess!** The owner must perform a risk assessment (RA) on all or a sample of other assisted units where a child under age six lives or is expected to live (covered units).
-  **Do I perform RAs on all or a sample of units?** See the guidance table in “Lead-Based Paint Inspection” in [Guidelines](#).
-  **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.

Risk assessment identified lead-based paint hazards in other covered unit(s)... What now?

-  **Notify!** Notify your local HUD Field Office within 10 business days of receiving results and the families in the unit(s) and building residents within 15 calendar days.
-  **Clear!** The unit must pass a clearance examination in the unit and common areas within 30 calendar days of receiving the EI results. Clearance is the owner’s responsibility, but the PHA may wish to assist.
-  **Notify!** Owner is responsible for notifying all building residents that work is complete and of any hazard reduction activities undertaken. Provide documentation to your local HUD Field Office within 10 business days of completion of clearance.
-  **What if risk assessments did not identify lead-based paint hazards?** Then EBLL response for other covered units is complete.
-  **Where do I find a certified assessor?** Contact your state lead licensing agency or visit www.epa.gov/lead.
-  **Can my health department do the EI?** Yes, see [Guidelines](#) for further information.

If lead-based paint hazards were identified, the owner will be responsible for conducting any necessary control work and implementing occupant protections. Be sure to monitor these steps!

All necessary environmental investigations, risk assessments, and control work are completed... What now?

-  **Reevaluate!** The owner is responsible for ensuring that the unit(s) continues to be lead-safe. Reevaluation requirements will vary depending on the value of the PBV.
-  **How do I know if and 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.

Guidance for PHA Staff:

Key Definitions

Environmental Investigation (EI)

A risk assessment with additional questions for the family regarding other sources of lead exposure and testing of other potential sources of lead exposure.

Elevated Blood Lead Level (EBLL)

A confirmed concentration of lead in whole blood of a child under age six equal to or greater than the concentration in the most recent guidance published by HHS.

Index Unit

The unit where a child with an EBLL resides.

Lead-Based Paint Hazard (“Hazard”)

Any condition that causes exposure to lead from dust-lead hazards, soil-lead hazards, or lead-based paint that is deteriorated or present in surfaces that would result in adverse human health effects.

Temporary Relocation

When occupants currently living in a dwelling intend to return to that unit once the work is finished. There are many possible variations – from requesting residents to vacate the unit for just one workday (leaving their belongings in the unit and returning at the end of the day) to moving everything out for several weeks or months.

Lead-Safe

No deteriorated paint or failed lead hazard control methods.

Other Covered Unit(s)

Federally-assisted units where a child under age six lives or is expected to live (e.g., in the case of knowledge of a pregnancy). Includes other assisted units designated as housing for the elderly and/or persons with disabilities where a child under age six resides or is expected to reside.

Risk Assessment

An on-site investigation to determine the existence, nature, severity, and location of lead-based paint hazards. Also includes a report explaining the results and options for reducing lead-based paint hazards. Can be performed only by risk assessors certified or licensed by EPA or an EPA-authorized entity.

