



OFFICE OF LEAD HAZARD CONTROL
AND HEALTHY HOMES

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

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

FROM: Yolanda Brown, Programs Division Director,
Office of Lead Hazard Control and Healthy Homes, LM

SUBJECT: Environmental Assessment and Finding of No Significant Impact
under the National Environmental Policy Act – Notice of Funding
Availability for Fiscal Year 2020: **Older Adult Home Modification
Program FR-6400-N-69**

It is the finding of this Office that the publication of the attached Notice of Funding Availability (NOFA) for the Older Adult Home Modification Program described by the attached funding notice FR-6400-N-69 does not constitute a major federal action having an individual or cumulative significant effect on the human environment, and therefore does not require the preparation of an Environmental Impact Statement.

The notice sets out the guidance to govern the Older Adult Home Modification Program, which is authorized and funded by the Consolidated Appropriations Act, 2019, approved February 15, 2019 (Public Law 116-6), the Further Consolidated Appropriations Act, 2020, approved December 20, 2019 (Public Law 116-94), and the Consolidated Appropriations Act, 2021, approved December 27, 2020 (Public Law 116-260). There are no prior year funds for this program.

The FY 2020 Older Adult Home Modification Program purpose is to assist nonprofit organizations, state and local governments, and public housing authorities in undertaking comprehensive programs that make safety and functional home modification repairs to meet the needs of low-income elderly homeowners. The goal of the home modification program is to enable low-income seniors to remain in their homes through low-cost, low barrier, high impact home modifications to reduce older adults' risk of falling, general safety, and/or to improve their functional abilities in their home. This will enable older adults to remain in their homes, that is, to "age in place," rather than move to nursing homes or other assisted care facilities. Note that eligible beneficiaries are low-income homeowners who are at least 62 years old, and reside in their privately owned, single-family primary residence. Additionally, Congress specified that at least 50 percent of funding under this NOFA must be made available to communities with substantially rural populations.

Eligible activities for the program include installation of adaptive equipment, such as temporary ramps, tub/shower transfer bench, handheld shower head, raised toilet seat, risers for chairs and sofas, and non-slip strips for tub/shower or stairs. A broader range of home

modifications and adaptive equipment to be used to optimize the home environment and increase independence can be found in the Appendix.

Grant awards under this NOFA do not constitute approval of specific sites or projects where activities that are subject to environmental review may be carried out. Grants awarded under this notice are subject to compliance with 24 CFR part 50, Protection and Enhancement of Environmental Quality. Upon award, each recipient will execute a grant agreement with HUD. For all cooperative agreements under this NOFA, recipients and other participants in the project are prohibited from undertaking or committing or expending HUD or non-HUD funds (including leveraged funds) on, a project or activities under this NOFA (other than activities listed in 24 CFR 50.19(b) and that appear in the Maintenance column of the Table of Home Modifications/Repairs) until HUD has completed the appropriate environmental review in the HUD Environmental Review Online System (HEROS), and has issued the notice of completion, with any mitigation measures if applicable. The terms and conditions of each grant agreement will incorporate these Environmental Review requirements.

The Office has considered the potential environmental impacts of the eligible activities of the notice listed above, and determines that they generally fall into one of two categories, either categorically excluded from review under the National Environmental Policy Act and subject to the related federal laws at 24 CFR § 50.4, per § 50.20(a)(2), or categorically excluded and not subject to the related federal laws, per § 50.19(a). The NOFA does not permit new construction, substantial rehabilitation, changes in (land) use or unit density, demolition of housing units or detached buildings; thus, justifying the determination of categorical exclusion at § 50.20(a)(2)(i)-(ii).

The Older Adult Home Modification Program is voluntary for the beneficiary and must be designed to either reduce risk of falling, provide general safety, and/or to improve functional abilities of the client to make tasks easier, reduce accidents, and lengthen time the client can continue to live in their primary residence. The Program Services Model or its equivalent, if approved by HUD, will include the following components:

1. *Initial Interview and In-Home Assessment conducted by a Licensed Occupational Therapist (OT) or a Certified Aging in Place Specialist (CAPS).* The OT or CAPS will conduct the initial interview with the client in their home and assess the home for safety and hazards, and/or the client's functional abilities and environmental fit.
2. *Work Order by the OT or CAP.* With the client's consent, the OT or CAP will prioritize the necessary home modifications and complete a work order and any additional specifications (e.g., placing tape on walls to indicate position of grab bars).
3. *Home Modification Work.* The work must be performed by a licensed contractor qualified to perform the required work.
4. *Follow-up Assessment and Inspection.* The OT or CAPS will conduct an in-home follow-up assessment including education and training of the client in the safe and proper use of adaptive equipment. The OT or CAPS will also inspect the work of the repair person to ensure that it meets the requirements and complete a work order for any required adjustments.

In addition, the following requirements apply to all grantee personnel (staff, contractors) who make structural modifications in a client's home.

1. Must participate in an onboarding process designed by the grantee before performing work that reflects the program's desired approach to interacting with older adults and their caregivers and families;
2. Must be licensed, bonded, and insured;
3. For mobile homes and manufactured homes, must follow state licensing requirements for repair/modification of mobile homes and manufactured homes; and
4. Must provide a warranty period acceptable to the grantee for all home modification (e.g., one year).

Additionally, the Office included in its analysis, provisions for compliance with the Occupational Safety and Health Administration (OSHA) or the state or local occupational safety and health regulations, whichever are more stringent (e.g., 29 CFR parts 1910 and/or 1926, as applicable).

Publication of the notice does not provide approval of a major Federal action having a significant impact on the human environment, sets forth the Environmental Requirements under applicable HUD environmental review regulations for individual projects, and provides particular methods and standards by which evaluation and hazard reduction work is to be performed. Before actions that could have a physical impact or limit the choice of alternatives may be taken, there will be an environmental review done under 24 CFR part 50 (by HUD) that will assess the potential environmental impacts in a local setting before the impacts or any choice limiting activities may take place. Accordingly, it is the determination of this office that a Finding of No Significant Impact may be made.

Attachment

Concurrences:

Karen M. Griego
Program Environmental Clearance Officer

Date

Christopher H. Hartenau
Environmental Clearance Officer
Office of General Counsel

Date

Elizabeth Zepeda
Acting Director
Office of Environment and Energy

Date

Approval:

Date

Michelle Miller
Deputy Director, Office of Lead Hazard Control and Healthy Homes

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Name	Griego	Friedman				

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U.S. Department of Housing and Urban Development
Previous edition is obsolete.

form HUD-713.1 (02/03)

APPENDIX

Appendix A – Substantially Rural Community Lookup Tool

Open the spreadsheet file included in the application package:
FY 2020 Home Modification NOFA Substantially Rural Community Lookup Tool.xlsx.

The first tab of the spreadsheet, labeled Lookup, contains instructions and cells for obtaining data about the community(ies) (called jurisdiction(s) here) you are considering as your target area for this grant.

The subsequent tabs of the spreadsheet have information about the jurisdiction(s) based on the 2010 Census, the most recent one for which Census has developed and provided the information. The information in these tabs in the posted version of this spreadsheet is not changeable.

The overall approach to determine if a jurisdiction is substantially rural or not is to select its

location information through drop-down menus. This includes:

For each single jurisdiction:

- Selecting its state,
- Then selecting its county,
- Then, if the jurisdiction is smaller than a county, selecting the county subdivision (if the target area is in such a subdivision in one of the 20 states that has its subdivisions recognized by the Census Bureau: CT, IL, IN, KS, MA, ME, MI, MN, MO, NE, NH, NJ, NY, ND, OH, PA, RI, SD, VT, and WI), and,
- If applicable, selecting the place.

The spreadsheet then enters the location information you have selected, and the information on the jurisdiction's rural and urban populations into Table 1. The spreadsheet then calculates whether the jurisdiction is substantially rural or not substantially rural, based on whether the population is at least half rural or less than half rural, respectively.

Target area with one jurisdiction:

If your target area consists of one jurisdiction, and it is in the rurality classification category you

intended to apply in, copy Table 1 (the row of headers and the row of information) into your application. You may, if you wish, narrow the table column widths.

If your target area is not the rurality classification category you intended to apply in, you may delete the information in Table 1, and select another jurisdiction, using the same procedure as before, and determine if your new jurisdiction has the rurality status you want it to have. When you are satisfied with the rurality status of your target area jurisdiction, copy and paste Table 1 into your application. You may, if you wish, narrow the table column widths.

Target area with multiple jurisdictions:

If your target area consists of multiple jurisdictions, see the additional instructions below Table 1, which involves repeating the steps above for each jurisdiction, copying the values of the jurisdictions cells in Table 1 into the first blank row of Table 2.

The bottom row of Table 2 provides the overall classification of your target area, indicating that, overall, it is substantially rural or not substantially rural.

If this is the rurality classification category you intended to apply in, copy and paste Table 2 into your application, deleting blank rows, and, if you wish, narrowing column widths.

If this is not the rurality classification category you intended to apply in, you may delete the information in one or more of the rows of Table 2; only the jurisdictions remaining in Table 2 are used to determine the substantially rural or not (“rurality”) status. You may, if you wish, add jurisdictions to Table 2, using the same procedure as before, and determine if your new set of jurisdictions has the rurality status you want it to have. (The spreadsheet is not concerned with blank rows; you need not move rows up in the spreadsheet to fill in the blank rows.)

When you are satisfied with the rurality status of your target area, copy and paste Table 2 into your application, deleting blank rows, and, if you wish, narrowing column widths.

Appendix B - Home Modifications/Repairs

Feature or System	Examples of OAHMP Maintenance Repair Activities	Examples of OAHMP Rehabilitation Repair
Site	<ul style="list-style-type: none"> • adding or replacing address number so it is visible from the street for emergency responders • power-washing slippery exterior surfaces 	<ul style="list-style-type: none"> • construction of new walkways, driveways or parking areas, or replacement thereof
Building Exterior	<ul style="list-style-type: none"> • adding exterior lighting at entrances (to include automatic sensors) • installing new or adjusting mailbox to make it easier to reach • fixing gutters and downspouts if causing safety hazard • manufactured / mobile home skirting 	<ul style="list-style-type: none"> • roof installation • gutter and/or downspout installation

<p>Exterior walkways and steps</p>	<ul style="list-style-type: none">• graded ground ramps• installing temporary/modular ramps (placed on top of the ground) for accessibility for individuals with a disability• placing temporary anti-slip tape or colored tape or paint on surfaces• applying directional signage or marking for wayfinding• installing handrails on both sides of steps and/or pathways• repairing cracked, broken, or uneven pathways (pavement, brick, etc.)• installing pathway lighting	<ul style="list-style-type: none">• installing permanent ramps (with footings set into the ground) for accessibility• installing exterior stairlift• installing wheelchair platform and lift
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<p>Exterior Windows and Doors</p>	<ul style="list-style-type: none">• installing automatic doors or automatic door openers• installing magnetic screen door• replacing door lock with one that is easier to operate• replacing doorknobs with lever-style handles• adding or adjusting peephole or viewing panel to correct height for client• eliminating trip hazards at entry threshold• installing “tap-n-go” or other hands-free door hold open capability	<ul style="list-style-type: none">• widening exterior doorway to accommodate a walker or wheelchair• replacement of exterior door• replacement of windows
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	<ul style="list-style-type: none">• adjusting windows to make them easier to open and close• fixing broken window pane(s), storm window(s) or damaged entry door• adding storm windows or storm doors	
Interior Walls, Windows, and Ceilings	<ul style="list-style-type: none">• adjusting or replacing hardware for drapes, shades, and/or curtains to make them easier to use• building shelf to improve hands-free activity or to improve accessibility• patching or mending cracked plaster	<ul style="list-style-type: none">• installing new drywall or paneling• installing new acoustical ceiling

	<ul style="list-style-type: none"> • patching or fixing holes or cracks in drywall 	
Interior Doors and Hallways	<ul style="list-style-type: none"> • adjusting door swings to reverse or remove awkwardness • installing automatic doors or door openers • installing door hinge offset or swing clear door hinges • installing “tap-n-go” or other hands-free door hold-open capability 	<ul style="list-style-type: none"> • installing different door type • widening interior doorways to accommodate a walker or wheelchair • widening hallways to accommodate a walker or wheelchair
Flooring	<ul style="list-style-type: none"> • repairing flooring transitions so there is zero height difference between them 	<ul style="list-style-type: none"> • installation of new floor if the existing floor has extensive slipping or tripping hazards resulting

	<ul style="list-style-type: none"> • repairing floor tile to remove uneven surfaces • repairing floors to remove uneven surfaces • stripping floors and resealing when incidental to other work • installing linoleum/vinyl flooring to remove uneven surfaces that pose extensive slipping or tripping hazards • carpet removal • cleaning floor when incidental to other work 	<p>from deterioration or damage</p>
Interior Stairways (Circulation)	<ul style="list-style-type: none"> • installing railings • maintaining chair lift/stair climber 	<ul style="list-style-type: none"> • installing chair lift/stair climbers

	<ul style="list-style-type: none"> • replacing broken stair treads or balusters • applying adhesive strips with nonslip surface • applying adhesive tape or paint to distinguish thresholds and edges • carpet removal • installing super-pole between floor and ceiling with or without pivot arm 	
Bathroom/ Laundry	<ul style="list-style-type: none"> • installing grab bars • adding nonskid strips to bathtub or shower floor • installing a hand-held or adjustable showerhead 	<ul style="list-style-type: none"> • complete or substantial bathroom remodel • installing new wall tile • installing a walk-in shower or bathtub

	<ul style="list-style-type: none">• installing clamp for handheld shower on wall or grab bar• tub cuts to enable easy entry/conversion to shower• installing curved shower rod• installing easy-to-use lever handles rather than knobs or turn handles for the sink, bathtub and shower faucets feature• replacing toilet with comfort-height model• installing pedestal or wall hung sink for wheelchair accessibility• insulating exposed pipes beneath the sink to protect against touching a hot pipe	
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	<ul style="list-style-type: none">• cushioning exposed pipes beneath the sink to protect against bumping• replacing or adjusting position of bathroom mirror, toilet paper holder, and other accessories to meet client's needs• replacing cabinet hardware, such as replacing round knobs with D-shaped handles• installing new toilet handles• installing toilet riser with handles• installing toilet safety frame or rails• repairing toilet seats• installing wall soap holder	
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	<ul style="list-style-type: none"> • repairing wall tile • securing rugs with rubber carpet mesh or double-sided rug tape • unclogging sink or toilet when incidental to other work • moving or replacing washing machines and dryers • replacing broken medicine cabinet 	
Kitchens	<ul style="list-style-type: none"> • replacing cabinet hardware, such as replacing round knobs with D-shaped handles • removing or replacing interior of existing cabinetry for easier access (e.g., pull-out drawers and shelves) 	<ul style="list-style-type: none"> • complete or substantial kitchen remodel • install lower work surface that can be used while seated • lowering of cabinets

	<ul style="list-style-type: none">• replace faucets with lever-, touch-, or sensor-style faucet• install easy-to-use ABC-rated fire extinguisher in an easy-to-reach place• install automatic stove turnoff devices	
Electrical/ Lighting	<ul style="list-style-type: none">• adding stick-on motion sensor lighting• adding task lighting under cabinets and over counters and tables• changing light bulbs• adding light switches at top and bottom of stairs for safety	<ul style="list-style-type: none">• major rewiring of building• installing new electrical service• replacing or moving electrical panels

	<ul style="list-style-type: none"> • replacing light switches with safety and accessibility features such as glow in the dark, rocker-style switches, or other easy-to-function switches • moving light switches and electrical outlets where they are more accessible to the individual • adding ball chain extension to ceiling fan/light 	
HVAC / Plumbing systems	<ul style="list-style-type: none"> • replacing thermostat with one that has accessibility features • setting home's water heater or replacing its thermostat, to ensure hot water is at or below 120°F to avoid scalding 	<ul style="list-style-type: none"> • installing new furnace or heat distribution system • installing central air conditioning • installing new plumbing system

	<ul style="list-style-type: none"> • installing pressure-balanced, temperature-regulated sink faucets in kitchen and bath 	<ul style="list-style-type: none"> • new water or sewer connection
Security	<ul style="list-style-type: none"> • adding security technology to entrance door • installing secure slide latch or chain inside entrance door 	<ul style="list-style-type: none"> • installing new security alarm system
Life Safety	<ul style="list-style-type: none"> • installing GFCI outlet • repairing electrical outlets • installing or servicing smoke, fire and CO detectors • installing or replacing doorbell that can be seen or heard by client throughout the house • cleaning surface mold 	<ul style="list-style-type: none"> • making substantial physical changes to a building to comply with fire and life safety codes • installing fire suppression system • chimney repairs • mold remediation

Appendix C – Housing and Demographic Data

Certain information required to be provided under the pre-application's Rating Factor 2 – Need for the Program, is available through the Census Bureau's [American Housing Survey](#) and/or [American Community Survey](#), as indicated in the rating factor narrative. Using table creation and data search tools on one or both of these websites, as applicable, provide the information for each subfactor for the county that includes your target area, or for the state, if the county level information is not available. If your target area is found in more than one county, aggregate the data from each county to compute totals and to compute averages, as applicable. Use the most recent dataset's year's data or, for more stable estimates, the most recent 5-year data.