

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 Opportunity for Fiscal Year 2022: Older Adult Home Modification Program FR-6600-N-69

It is the finding of this Office that the publication of the attached Notice of Funding Opportunity (NOFO) for the Older Adult Home Modification Program described by the attached funding notice FR-6600-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 (OAHMP), which is authorized and funded by the Consolidated Appropriations Act, 2022, approved March 15, 2022 (Public Law 117-103).

The OAHMP awards will be in the form of cooperative agreements with recipients in one or more of the following categories:

- State governments
- County governments
- City or township governments
- Special district governments
- Nonprofits having 501(c)(3) status with the IRS, other than institutions of higher education

The FY 2022 Older Adult Home Modification Program's purpose is to assist experienced 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, improve general safety, increase accessibility, and 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 primary residence. Additionally, Congress specified that at least one third of funding under this NOFO must be made available to communities with substantially rural populations.

Eligible activities for the program include installation of adaptive equipment, such as installation of grab bars, railings, and lever-handled doorknobs and faucets, as well as the installation of adaptive equipment, such as temporary ramp, tub/shower transfer bench, handheld shower head, raised toilet seat, risers for chairs and sofas, and non-slip strips for tub/shower or stairs. Examples of a broader range of home modifications and adaptive equipment to be used to optimize the home environment and increase independence can be found in Appendix B of this memorandum.

Grant awards under this NOFO 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 58, Protection and Enhancement of Environmental Quality. For all cooperative agreements under this NOFO, 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 NOFO (other than activities listed in 24 CFR §§ 50.19(b), 58.34, 58.35(b), or 58.22(f), including activities that appear in the Maintenance column of the Table of Home Modifications/Repairs in Appendix B until HUD approves the Responsible Entity's Request for Release of Funds and Certification under 24 CFR Part 58 and the Responsible Entity completes the second, site-specific tier of a tiered environmental review, or HUD completes the environmental review and notifies the grantee of its approval. The results of the environmental reviews may require that proposed activities be modified, or proposed projects rejected.

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 of 1969 (42 U.S.C. § 4321) and subject to the related federal laws at 24 CFR §§ 50.4, and 58.5, per §§ 50.20 and 58.35(a), or exempt/categorically excluded and not subject to the related federal laws, per 24 CFR §§ 50.19(b)(1), (3), (5), (7), (8) and (9) or 58.34(a)(1), (3), (5), (7), (8), and (9). The NOFO 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).

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

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) or

24 CFR Part 58 (by a responsible entity) 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

Christopher H. Hartenau Environmental Clearance Officer Office of General Counsel

Kristin L. Fontenot Departmental Environmental Clearance Officer

Approval:

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

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# FONSI: FY 2022 NOFO for Older Adult Home Modification Grant Program (FR-6600-N-69)

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	8/25/2022	8/25/2022				
Official Record Copy U.S. Department of Housing and Urban Development form HUD-713.1 (02/03) Previous edition is obsolete.						

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# APPENDIX Appendix A – Substantially Rural Community Lookup Tool

Open the spreadsheet file located

at: <u>https://www.hud.gov/program\_offices/spm/gmomgmt/grantsinfo/fundingopps/oahmp</u>. FY 2022 Home Modification NOFO 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 2020 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.

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#### 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.

Feature or System	<b>Examples of OAHMP Maintenance Repair</b> <b>Activities</b>	Examples of OAHMP Renovation Activities
Site	<ul> <li>adding or replacing address number so it is visible from the street for emergency responders</li> <li>power-washing slippery exterior surfaces</li> </ul>	<ul> <li>construction of new walkways, driveways or parking areas, or replacement thereof</li> </ul>
Building Exterior	<ul> <li>adding exterior lighting at entrances (to include automatic sensors)</li> <li>installing new or adjusting mailbox to make it easier to reach</li> <li>fixing gutters and downspouts if causing safety hazard</li> <li>manufactured / mobile home skirting</li> </ul>	<ul> <li>roof installation</li> <li>gutter and/or downspout installation</li> </ul>

#### **Appendix B - Home Modifications/Repairs**

Exterior walkways and steps	<ul> <li>graded ground ramps</li> <li>installing temporary/modular ramps (placed on top of the ground) for accessibility for individuals with a disability</li> <li>placing temporary anti-slip tape or colored tape or paint on surfaces</li> <li>applying directional signage or marking for wayfinding</li> <li>installing handrails on both sides of steps and/or pathways</li> <li>repairing cracked, broken, or uneven pathways (pavement, brick, etc.)</li> <li>installing pathway lighting</li> </ul>	<ul> <li>installing permanent ramps (with footings set into the ground) for accessibility</li> <li>installing exterior stairlift</li> <li>installing wheelchair platform and lift</li> </ul>
Exterior Windows and Doors	<ul> <li>installing automatic doors or automatic door openers</li> <li>installing magnetic screen door</li> <li>replacing door lock with one that is easier to operate</li> <li>replacing doorknobs with lever- style handles</li> <li>adding or adjusting peephole or viewing panel to correct height for client</li> <li>eliminating trip hazards at entry threshold</li> <li>installing "tap-n-go" or other hands-free door hold open capability</li> <li>adjusting windows to make them easier to open and close</li> <li>fixing broken window pane(s), storm window(s) or damaged entry door</li> <li>adding storm windows or storm doors</li> </ul>	<ul> <li>widening exterior doorway to accommodate a walker or wheelchair</li> <li>replacement of exterior door</li> <li>replacement of windows</li> </ul>
Interior Walls, Windows, and Ceilings	• adjusting or replacing hardware for drapes, shades, and/or	<ul> <li>installing new drywall or paneling</li> </ul>

	<ul> <li>curtains to make them easier to use</li> <li>building shelf to improve hands-free activity or to improve accessibility</li> <li>patching or mending cracked plaster</li> <li>patching or fixing holes or cracks in drywall</li> </ul>	<ul> <li>installing new acoustical ceiling</li> </ul>
Interior Doors and Hallways	<ul> <li>adjusting door swings to reverse or remove awkwardness</li> <li>installing automatic doors or door openers</li> <li>installing door hinge offset or swing clear door hinges</li> <li>installing "tap-n-go" or other hands-free door hold-open capability</li> </ul>	<ul> <li>installing different door type</li> <li>widening interior doorways to accommodate a walker or wheelchair</li> <li>widening hallways to accommodate a walker or wheelchair</li> </ul>
Flooring	<ul> <li>repairing flooring transitions so there is zero height difference between them</li> <li>repairing floor tile to remove uneven surfaces</li> <li>repairing floors to remove uneven surfaces</li> <li>stripping floors and resealing when incidental to other work</li> <li>installing linoleum/vinyl flooring to remove uneven surfaces that pose extensive slipping or tripping hazards</li> <li>carpet removal</li> <li>cleaning floor when incidental to other work</li> </ul>	<ul> <li>installation of new floor if the existing floor has extensive slipping or tripping hazards resulting from deterioration or damage</li> </ul>
Interior Stairways (Circulation)	<ul> <li>installing railings</li> <li>maintaining chair lift/stair climber</li> <li>replacing broken stair treads or balusters</li> </ul>	<ul> <li>installing chair lift/stair climbers</li> </ul>

	<ul> <li>applying adhesive strips with nonslip surface</li> <li>applying adhesive tape or paint to distinguish thresholds and edges</li> <li>carpet removal</li> <li>installing super-pole between floor and ceiling with or without pivot arm</li> </ul>	
Bathroom/ Laundry	<ul> <li>installing grab bars</li> <li>adding nonskid strips to bathtub or shower floor</li> <li>installing a hand-held or adjustable showerhead</li> <li>installing clamp for handheld shower on wall or grab bar</li> <li>tub cuts to enable easy entry/conversion to shower</li> <li>installing curved shower rod</li> <li>installing easy-to-use lever handles rather than knobs or turn handles for the sink, bathtub and shower faucets feature</li> <li>replacing toilet with comfort- height model</li> <li>installing exposed pipes beneath the sink to protect against touching a hot pipe</li> <li>cushioning exposed pipes beneath the sink to protect against bumping</li> <li>replacing or adjusting position of bathroom mirror, toilet paper holder, and other accessories to meet client's needs</li> <li>replacing cabinet hardware, such as replacing round knobs with D- shaped handles</li> <li>installing new toilet handles</li> </ul>	<ul> <li>complete or substantial bathroom remodel</li> <li>installing new wall tile</li> <li>installing a walk-in shower or bathtub</li> </ul>

	<ul> <li>installing toilet riser with handles</li> <li>installing toilet safety frame or rails</li> <li>repairing toilet seats</li> <li>installing wall soap holder</li> <li>repairing wall tile</li> <li>securing rugs with rubber carpet mesh or double-sided rug tape</li> <li>unclogging sink or toilet when incidental to other work</li> <li>moving or replacing washing machines and dryers</li> <li>replacing broken medicine</li> </ul>	
Kitchens	<ul> <li>cabinet</li> <li>replacing cabinet hardware, such as replacing round knobs with D-shaped handles</li> <li>removing or replacing interior of existing cabinetry for easier access (e.g., pull-out drawers and shelves)</li> <li>replace faucets with lever-, touch-, or sensor-style faucet</li> <li>install easy-to-use ABC-rated fire extinguisher in an easy-to-reach place</li> <li>install automatic stove turnoff devices</li> </ul>	<ul> <li>complete or substantial kitchen remodel</li> <li>install lower work surface that can be used while seated</li> <li>lowering of cabinets</li> </ul>
Electrical/ Lighting	<ul> <li>adding stick-on motion sensor lighting</li> <li>adding task lighting under cabinets and over counters and tables</li> <li>changing light bulbs</li> <li>adding light switches at top and bottom of stairs for safety</li> <li>replacing light switches with safety and accessibility features such as glow in the dark, rocker- style switches, or other easy-to- function switches</li> </ul>	<ul> <li>major rewiring of building</li> <li>installing new electrical service</li> <li>replacing or moving electrical panels</li> <li>*Some lighting and/or electrical work may prompt and environmental review and permits from local and state governing agencies.</li> </ul>

	<ul> <li>moving light switches and electrical outlets where they are more accessible to the individual</li> <li>adding ball chain extension to ceiling fan/light</li> </ul>	
HVAC / Plumbing systems	<ul> <li>replacing thermostat with one that has accessibility features</li> <li>setting home's water heater or replacing its thermostat, to ensure hot water is at or below 120°F to avoid scalding</li> <li>installing pressure-balanced, temperature-regulated sink faucets in kitchen and bath</li> </ul>	<ul> <li>installing new furnace or heat distribution system</li> <li>installing central air conditioning</li> <li>installing new plumbing system</li> <li>new water or sewer connection</li> <li>**Some HVAC and plumbing work may prompt and environmental review and permits from local and state governing agencies.</li> </ul>
Security	<ul> <li>adding security technology to entrance door</li> <li>installing secure slide latch or chain inside entrance door</li> </ul>	• installing new security alarm system
Life Safety	<ul> <li>installing GFCI outlet</li> <li>repairing electrical outlets</li> <li>installing or servicing smoke, fire and CO detectors</li> <li>installing or replacing doorbell that can be seen or heard by client throughout the house</li> <li>cleaning surface mold</li> </ul>	<ul> <li>making substantial physical changes to a building to comply with fire and life safety codes</li> <li>installing fire suppression system</li> <li>chimney repairs</li> <li>mold remediation</li> </ul>

\*Refer to local/state guidelines for building codes and regulations as the workplan is developed, to ensure compliance with residential and environmental protocols.

**Appendix C – Housing and Demographic Data** Certain information required to be provided under the preliminary application's Rating Factor 2

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- Need for the Program, is available through the Census Bureau's American Housing Survey (<u>https://www.census.gov/programs-surveys/ahs.html</u>) and/or American Community Survey (<u>https://www.census.gov/programs-surveys/acs/</u>), 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 re