

Module 4: Rehabilitation—Construction Phase

Module Objectives:

Students will be able to:

- Describe how to bid lead hazard reduction work
- List items to be discussed at pre-construction conference
- Describe how to monitor construction for lead compliance
- Describe how to relocate residents
- Explain how to conduct final inspection and clearance
- Explain impact of ongoing maintenance on the project

Module Overview: The module is summarized below.

Introduction	Overview of Module
Exercise 4-1 Contractor Selection	Participants read a brief scenario about Coolsville's bid process and answer questions in small groups about the information that needs to be provided to contractors to make appropriate bids.
Exercise 4-2 Pre-Construction Conference	Participants read a brief scenario regarding pre-construction conference and discuss as a large group: <ul style="list-style-type: none"> • Topics to be covered at the pre-construction conference • How to document the contractor's commitment to these items.
Exercise 4-3 Occupant Protection	Participants read a brief scenario on relocating the Jones for one week and answer questions in small groups about how relocation must be done and their options.
Exercise 4-4 Construction Monitoring	Participants read a brief scenario on construction monitoring and, as a large group, answer questions about when and how to monitor lead hazard reduction projects. This exercise includes a component where the trainer shows pictures of job sites and the participants state "what is wrong with this picture".
Exercise 4-5 Final Inspection and Clearance	Participants read a brief scenario on Final Inspection and in small groups answer questions about clearance and how to document that a project was properly done. Debrief highlights such items as how to read a clearance report.
Exercise 4-6 Ongoing Monitoring and Maintenance	Participants read a brief scenario on ongoing monitoring and as a large group discuss the requirements for ongoing monitoring and how they affect project planning.
Wrap-up	Review of Job File Checklist and other key resources.

Module 4: Rehabilitation -- Construction Phase

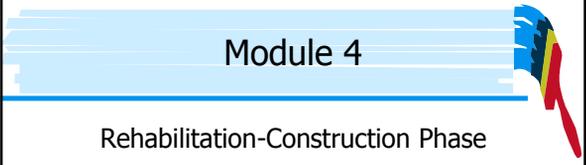
List of Useful Resources

Resource	Where to Find It
1. Sample RFP for Contractors	Form 29
2. Pre-Construction Conference Checklist	Form 15
3. Rehabilitation Contract Addendum	Form 18
4. EPA Memo on Waste	Form 17
5. Contractor/Employee Certification of Worker Training	Form 16
6. Elderly Waiver for Relocation	Form 13
7. Protection of Occupant's Belongings and Worksite Preparation for Projects with Lead Hazard Reduction Activities	Form 20
8. Re-Occupancy Authorization	Form 27
9. Sample Clearance Report	Form 22
10. Clearance Report Review Worksheet	Form 21
11. Lead Paint Clearance Testing Reimbursement for HOME and CDBG Grantees	Form 50
12. Clearance Protocol for HUD-Assisted Properties	Form 51
13. Abatement Report Worksheet	Form 26
14. Post-Construction Safe Work Certification	Form 19
15. Ongoing Monitoring and Maintenance Certifications	Form 24
16. Rehabilitation Job File Checklist	Form 28
17. <i>Chapter 4: Addressing Lead-Based Paint in Rehabilitation Programs</i>	Reference Manual Chapter 4

Module 4

Rehabilitation-Construction Phase

Lead Based Paint Implementation Training



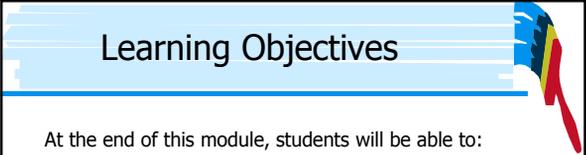
Learning Objectives

At the end of this module, students will be able to:

- Describe how to bid lead hazard reduction work
- List items to be discussed at pre-construction conference
- Describe how to monitor construction for lead compliance
- Describe how to relocate residents
- Explain how to conduct final inspection and clearance
- Explain impact of ongoing maintenance on the project

Lead Based Paint Implementation Training
Rehabilitation-Construction Phase

4-2



Exercise Overview

- Turn to Exercises (next page)
- In groups, complete exercises:
 - 4-1: Contractor Selection
 - 4-2: Pre-Construction Meeting
 - 4-3: Occupant Protection
- Record answers on worksheets
- Be prepared to report answers
- You have 15 minutes

Lead Based Paint Implementation Training
Rehabilitation-Construction Phase

4-3

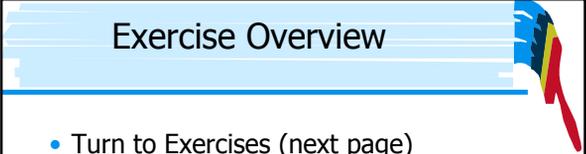


Illustration 1

How can you fix this picture?

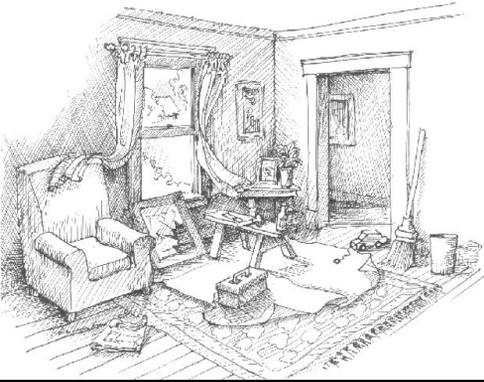


Illustration 2

How can you fix this picture?



Illustration 3

How can you fix this picture?



Exercise Overview

- Turn to Exercises (next page)
- In groups, complete exercises:
 - 4-4: Construction Monitoring
 - 4-5: Final Inspection and Clearance
 - 4-6: Ongoing Maintenance
- Record answers on worksheets
- Be prepared to report answers
- You have 15 minutes.

Lead Based Paint Implementation Training
Rehabilitation—Construction Phase

4-7

Closing Out the Job

- Have we covered all the steps?
 - See Rehab Job File Checklist (Form 28)
- What are the three most important factors in completing a homeowner rehabilitation project?

Lead Based Paint Implementation Training
Rehabilitation—Construction Phase

4-8

Key Resources: Contractors

- Contractor Selection
 - Sample Invitation to Bid (Form 29)
- Pre-Construction Conference
 - Pre-construction Conference Checklist (Form 15)
 - EPA Memo on Waste (Form 17)
 - Rehab Contract Addendum (Form 18)

Lead Based Paint Implementation Training
Rehabilitation—Construction Phase

4-9

Key Resources: Occupant Protection

- Interpretive Guidance
 - #S4: Lead Safe Units
 - #R13: Interim Clearance
 - #J24: Elderly Consent
- Forms
 - Reoccupancy Authorization (Form 27)
 - Elderly Informed Consent Form (Form 13)
 - Guidance on Relocation (Form 34)

Lead Based Paint Implementation Training
Rehabilitation—Construction Phase

4-10

Key Resources: Final Inspection

- Post Construction SWP Certification (Form 19) – *Optional*
- Sample Clearance Report and Review Worksheet (Forms 21 and 22)
- Abatement Report Worksheet (Form 26)
- Sample Notice of Lead Hazard Reduction (Form 23)
- Clearance Reimbursement (Form 50)

Lead Based Paint Implementation Training
Rehabilitation—Construction Phase

4-11

Module 4: Wrap-Up

- We've covered the construction process
- Tomorrow
 - Refining Your Rehab Program
 - Homebuyer
 - TBRA
 - Special Needs Housing

Lead Based Paint Implementation Training
Rehabilitation—Construction Phase

4-12

Exercise 4-2: Pre-Construction Conference

Bruce Smith meets with T & T Contractors for a pre-construction meeting. They walk through the home together and review the scope of work. He reviews the contract to show them changes that have been made to incorporate the requirements of the Lead Safe Housing Rule. Specifically, language has been added that makes T & T responsible for clean-up and states that Coolsville will only pay for one clearance test. Any costs for additional clearance tests must be absorbed by the contractor.

Questions:

1. Who should attend the pre-construction conference?
2. When should it be held?
3. How long should the meeting take?
4. What other issues or items regarding lead-based paint should Bruce review in the pre-construction meeting with T & T?
5. How are these requirements documented?

Work in small groups to answer the questions above.
Write your answers in the space provided.
You have **5 minutes**.

Exercise 4-3: Occupant Protection

Bruce planned the job so that the Jones's can stay in their home through most of the work. Individual rooms are contained while work is done and worksite clearance is performed before they are opened up. The Jones' have access to their kitchen and bathroom through most of the work. However, the Jones' need to be relocated from their home during week 4 of the construction project while work is done on the kitchen and bathroom. They need to be away from the unit for one week.

Questions:

1. What are the steps involved in relocating the Jones family?
2. How do you establish the relocation unit is lead-safe?
3. What if the Jones' were to be relocated for a longer period of time? How would this change your approach?
4. What needs to be done before the Jones' move back in to their home?
5. What if the Jones' were an elderly couple? Would they be required to relocate from their home for the week?

Work in small groups to answer the questions above.
Write your answers in the space provided.
You have **5 minutes**.

Exercise 4-4: Construction Monitoring

At the conclusion of the pre-construction meeting, Bruce Smith issues the notice to proceed and T & T begins work on the Jones' house. Bruce Smith plans to conduct inspections of the work before approving each invoice submitted by T & T. The contractor plans to invoice Coolsville on a monthly basis.

Questions:

1. How often should Bruce visit the job site and monitor T & T's work?
2. What types of work practices should Bruce be looking for to ensure T & T is following proper safe work practices?
3. What should Bruce do if he sees unsafe work practices at the site?
4. Halfway through the project, T & T needs a change order for the project. Suppose the change order caused rehabilitation hard costs to go over \$25,000. Does Bruce need to change the work method from interim controls to abatement?

Work in small groups to answer the questions above.
Write your answers in the space provided.
You have **5 minutes**.

Exercise 4-5: Final Inspection and Clearance

Bruce conducts a final inspection of the property to ensure that all the rehab work has been completed properly. Once the inspection is complete, T & T has arranged for the cleaning to be completed and a Risk Assessor to perform a clearance test on the property. The property passes clearance. T & T provides Bruce with the clearance report, lien releases, warranty information and a certification that safe work practices were followed.

Questions:

1. Who is qualified to conduct the clearance exam?
2. How soon after cleaning can the clearance test be performed?
3. What documents should be kept on file to show that the lead hazard reduction was properly completed?
4. If this was an abatement job, how would the job differ?

Work in small groups to answer the questions above.
Write your answers in the space provided.
You have **5 minutes**.

**Module 5:
Refining Your
Rehabilitation Program**

Module 5: Evaluating Your Rehabilitation Program

Module Objectives: Students will be able to:

- Describe strategies to address common design challenges for rehab programs
- Evaluate their own program's compliance with the lead rules

Module Overview: The module is summarized below.

Introduction	<ul style="list-style-type: none">• Overview of this module• Discussion of common challenges
Exercise 5-1: Tackling Design Challenges	<p>Participants break into small groups. Each group is assigned a scenario. For their scenario, they must evaluate the plan proposed, list the pros and cons, and then come up with their own proposal.</p> <p>Each group records its results on a flipchart.</p>
Gallery Walk	Participants circulate in the room and examine other groups' work.
Debrief	Participants share what they learned during the Gallery Walk and what most impressed them.
Exercise 5-2: Lead Wellness	Participants examine a "lead wellness" checklist for rehab programs and discuss how to fill it out. (But do not complete the full checklist at this time.)
Wrap up	

Module 5: Evaluating Your Rehabilitation Program

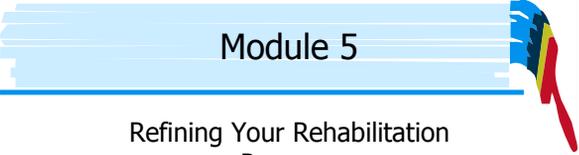
List of Useful Resources

Resource	Where to Find It
1. Guidance on Presuming or Evaluating	Form 33
2. Guidance on Relocation	Form 34
3. Relocation Screening Sheet	Form 25
4. Sample Relocation Agreement	Form 30
5. Certification of Relocation Activities	Form 31
6. List of Training Resources	Form 35
7. Guidance on Insurance	Form 36
8. Rehabilitation Standards for Single Family Structures	Form 32
9. Information on Volunteer Programs	Form 52

Module 5

Refining Your Rehabilitation Program

Lead Based Paint Implementation Training



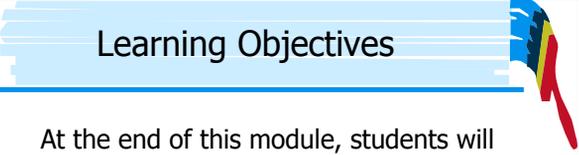
Learning Objectives

At the end of this module, students will be able to:

- Describe strategies to address common design challenges for rehab programs
- Evaluate their own program's compliance with the lead rules

Lead Based Paint Implementation Training
Refining Your Rehabilitation Program

5-2

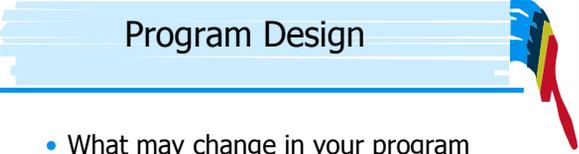


Program Design

- What may change in your program because of the Lead Safe Housing Rule?

Lead Based Paint Implementation Training
Refining Your Rehabilitation Program

5-3



Exercise 5-1: Tackling Design Challenges

- Work in groups
- Read the scenario assigned to you
- Answer the questions projected on the screen (next slide)
- List your responses on the flipchart
- You have 20 minutes

Lead Based Paint Implementation Training
Refining Your Rehabilitation Program 5-4

Exercise 5-1: Flipchart

Present your analysis on the flipchart provided

- Is the proposed strategy a good idea?
- List its pros and cons
- Provide one good alternative

Lead Based Paint Implementation Training
Refining Your Rehabilitation Program 5-5

Sharing Answers

- Assign a "presenter" to stay at your table and explain your work.
- Visit with other groups to see their work.
- Trade places with the presenter -- everyone needs time to circulate

Lead Based Paint Implementation Training
Refining Your Rehabilitation Program 5-6

Debrief

- What did you see that interested you?

Lead Based Paint Implementation Training
Refining Your Rehabilitation Program

5-7

Additional Resources

- Guidance on Presuming or Evaluating (Form 33)
- Guidance on Relocation (Form 34)
- Relocation Screening Sheet (Form 25)
- Sample Relocation Agreement (Form 30)
- Certification of Relocation Activities (Form 31)
- List of Training Resources (Form 35)
- Guidance on Insurance (Form 36)
- Rehabilitation Standards for Single-Family Structures (Form 32)

Lead Based Paint Implementation Training
Refining Your Rehabilitation Program

5-8

Exercise 5-2: Lead Wellness

- Review the "Lead Wellness Checklist"
- In your groups, begin to answer the questions
- Make sure you understand how it works
- Finish at home

Lead Based Paint Implementation Training
Refining Your Rehabilitation Program

5-9

Wrap-Up



- Where we've been:
 - Through the rehab process
 - Into some design challenges
 - Evaluating our own programs
- Where we're going:
 - Other programs: Homebuyer, TBRA, Special Needs

Exercise 5-1: Tackling Design Challenges

1. Read the scenario assigned to your group. Answer the following questions and record your answers on a flipchart.
 - a. Is the strategy proposed a good idea?
 - b. What are the pros and cons of the strategies?
 - c. Propose one alternative.
2. Read the other scenarios to prepare for the Gallery Walk.

Your Flipchart should look like this:

C – RELOCATION STRATEGIES	
GOOD IDEA?	
<u>PROS</u>	<u>CONS</u>
ONE ALTERNATIVE:	

Exercise 5-1: Scenarios A and B

A. Program Eligibility and Assistance Levels

The City of Billsville has two rehab programs:

- The Emergency Assistance Program (EAP) provides small deferred payment loans (usually under \$6000) to address small but critical housing issues such as furnaces and roofing. Most of their clients for this program are elderly residents on fixed incomes.
- The Homeowner Rehab Program provides zero percent interest loans up to \$35,000 to bring housing up to code and make other necessary improvements in owner-occupied single family dwellings. Participants make monthly payments on the loans once the project is completed.

Reviewing the subsidy limits for the EAP Program is an agenda item for this week's staff meeting. The Director has suggested limiting the EAP to \$5000. Bill, the rehab specialist asks, "What happens if the emergency costs more than \$5000?" Susan the finance specialist replies, "They will have to apply to the Homeowner rehab program."

As for the Homeowner Rehab program, staff are concerned about their loans over \$25,000. "Suppose we limit the federal assistance to those projects to \$24,999", suggests Dave, another finance specialist. "We could fund the rest with state funds and keep the level of assistance under \$25,000."

B. To Presume or To Evaluate? That is the question.

"It's easy to predict where the lead is" says Jack, the rehab specialist, as he briefs Stan, the housing director of Traintown. "In our pre-1950 buildings, its everywhere – the walls, the windows, exterior, interior, you name it. In our 1950 – 60s stock, its in the windows and doors. After 1960, it gets hard to tell."

Stan thinks about this and proposes the following: "Let's presume that lead is present in all pre-1950 units and perform standard treatments. In units built between 1950 and 60, presume lead is only in the doors and windows. In the post 1960 units, we will have to do risk assessments."

Jack replies, "Is that allowed? I know we can presume that lead is present, but I thought the presumption had to be for all applicable surfaces. I am also pretty sure we cannot presume the absence of lead."

Exercise 5-1: Scenarios C and D

C. Relocation Strategies and Planning

The Village of Lewisburg is considering a relocation plan for the first time for their housing programs. Prior to the Lead Safe Housing Rule (LSHR), participants had the option to stay or leave their homes but received no financial assistance from the village to pay for temporary housing. The staff is revisiting the issue of relocation because of the requirements of the LSHR.

George, the rehab specialist stated, “The LSHR doesn’t make us pay for folks to relocate, it just tells us when they have to be out of their houses and how to protect their belongings. So I don’t think we have to change anything except that during our interview we say –by the way you’ll need to leave your house for 1-2 weeks during the construction period. Suggest that they go stay with their Mom or some friends.”

Sally another rehab specialist jumps in, “But the rule says they need to be relocated to a lead-safe unit? How are we supposed to ensure this? What if Mom’s house is in worse condition than their own house? Then what will we do? Are we on the hook for having to fix Mom’s house now, too?”

Trina the director suggests, “If a client does not have family or friends they can stay with let’s add the relocation costs to their total loan amount.”

D. Recruiting and Retaining Contractors -- In Good times and Bad

Spellman Township’s housing staff feels pretty good about their efforts to implement the Lead Safe Housing Rule (LSHR) into their rehab program. They feel as they’ve left no stone unturned. Just last week they sent out a Request for Qualifications (RFQ) for moving companies (to help relocate folks) and laboratories (for testing).

Barb walks into her director’s office and sighs, “I don’t know why I bother spending time with these guys!” “What’s wrong?” asks Elaine the director. Barb explains that she hand-held four general contractors though the new requirements for the LSHR. She helped all four (as well as their staff) register for the Abatement Supervisor and Worker training courses. Only one, FIX IT, had actually attended the course and passed the Supervisor test, but hadn’t bothered to register with the State and become licensed.

Elaine asked why the other three contractors didn’t go to the training. “The contractors had “paying” work that day”, explained Barb, “and they couldn’t afford to take the time off for training and miss a paying gig.”

Elaine ponders this dilemma and suggests, “Why don’t we use our HOME admin funds to cover the registration fee? Would that be enough?”

Exercise 5-1: Scenario E

E. Staff Training: Maintaining Capacity

The City of Skyline administers a Homeowner Rehab Program providing loans to qualified occupants up to \$35,000. The City has its own staff perform the risk assessments for the units that go through this program. Skyline usually completes 15 of these projects a year.

During today's staff meeting, Calvin, Skyline's only rehab specialist, announced he will retire in six months. Calvin has worked for Skyline for 30 years. Everyone relies on Calvin to answer to their questions on everything from program rules to standard procedures. He plans to move to an active adult community 300 miles away two weeks after his last day on the job in Skyline.

Serena, the housing director, figures she has time to figure out what to do to keep production moving. No need to plan yet, Skyline's Human Resources Office will probably not even post the job opening until Calvin's last month on the job. They shouldn't have a problem getting applicants, *everyone* always wants a city job.

**Rehabilitation – Exercise 5-2
Lead Wellness Program Checklist**

Answer the following questions for your **program**. Note resources listed in “comments” column.
Also, each step lists one or more design considerations. These questions are not meant to be answered at this time; they simply highlight items to consider in your program design.

	Yes	No	Comments
STEP 1: APPLICATION			
1. Does your application form request all information needed to determine if the proposed project is subject to the Lead Safe Housing Rule (age of dwelling, etc.)			
2. Does your application packet include the Lead Hazard Information pamphlet?			See Form 1 for Pamphlet: Protect Your Family from Lead in Your Home.
3. Does your program application packet provide information to the applicant about lead hazard control (e.g. such as the possibility of a relocation)			
Design Considerations:			
<ul style="list-style-type: none"> Should program eligibility and assistance criteria be modified? 			
STEP 2: INSPECTION			
2. Answer “yes” if either A or B is correct for all projects in the program. A. Is paint testing conducted on all surfaces scheduled for rehab by a certified paint inspector or risk assessor? Or B. Is lead-based paint presumed to be present?			
3. Answer “yes” if either A or B is correct for all projects in the program. A. For jobs over \$5000, is a risk assessment conducted by a certified risk assessor? Or B. Are lead hazards presumed to be present throughout the unit?			
4. For each project, are the results of any paint testing and/or risk assessment documented in the project file?			

	Yes	No	Comments
5. For each project, is a notice of lead hazard evaluation provided to the resident?			See Lead Hazard Evaluation Notice (Form 10)
6. Is the level of assistance to the project clearly documented in every project file?			See Calculating Level of Rehabilitation Assistance Worksheets (Form 7) and Lead Safe Housing Requirements Screening Worksheet - Rehabilitation Addendum (Forms 5 and 6)
<p>Design Considerations:</p> <ul style="list-style-type: none"> Does the program have a strategy for presuming or evaluating? Has adequate data been collected to develop such a strategy? Does the program have access to a sufficient number of qualified risk assessors and/or paint inspectors? 			
STEP 3: PROJECT PLANNING			
7. For each project, is the work write-up and cost estimate revised based on the results of any paint testing or risk assessment?			
8. For each project, are residents clearly informed about the requirements for occupant protection (and relocation if necessary)?			
9. If the residents must be relocated, does the program have procedures to ensure that the relocation unit is lead safe?			
10. If the resident is elderly, is the resident offered the option to stay in the unit during the rehabilitation, while being properly informed of the risks?			See Elderly Waiver for Relocation (Form 13)
<p>Design Considerations:</p> <ul style="list-style-type: none"> Does the program have a written relocation policy for lead hazard reduction projects? 			
STEP 4: CONTRACTOR SELECTION			
11. Does the RFP clearly state the nature of the job and the qualifications of the workers needed?			See Sample RFP for Contractors (29)
<p>Design Considerations:</p> <ul style="list-style-type: none"> Is the pool of qualified contractors sufficient to meet demand? What can be done to increase the pool? Are contractor selection procedures efficient? 			

	Yes	No	Comments
STEP 5: PRE-CONSTRUCTION CONFERENCE			
12. At the pre-construction conference, is the contractor informed of the requirements related to lead hazard reduction: <ul style="list-style-type: none"> • Use of trained or supervised workers • Use of safe work practices • Prohibited practices • Occupant protection • Clean-up and Clearance 			See Pre-construction Construction Conference Checklist (Form 15)
13. Is the contractor informed that he is responsible for passing a clearance examination?			
Design Considerations: <ul style="list-style-type: none"> • Do all appropriate parties attend the pre-construction conference? 			
STEP 6: CONSTRUCTION MONITORING			
14. Are job sites monitored regularly to ensure that safe work practices are followed and that occupants and their belongings are properly protected?			
15. Are instances of non compliance communicated to the contractor?			
16. Are instances of non compliance corrected?			
17. Are corrections documented?			
18. Is clearance performed before occupants are allowed into a work area?			
19. Is a notice of re-occupancy provided to the relocated residents before they return to their units?			See Re-Occupancy Authorization (Form 27)
Design Considerations: <ul style="list-style-type: none"> • Are relationships in place with moving companies and laboratories? 			
STEP 7: FINAL INSPECTION AND CLEARANCE			
20. Is clearance conducted at least one hour after the job is complete?			
21. Is clearance conducted by a certified paint inspector, risk assessor, or lead sampling technician?			

	Yes	No	Comments
22. Is clearance performed by a professional who is independent from the contractor(s) who performed the lead hazard reduction and rehabilitation?			
23. Is the clearance report reviewed to make sure it is adequate?			
24. Is the clearance report kept in the project file?			
25. If clearance is not passed, is the unit re-cleaned and is clearance performed again?			
26. Is a notice of lead hazard reduction provided to the tenant within 15 days of passing clearance?			
27. Is the project file properly documented to reflect compliance with all Lead Safe Housing Rule Requirements.			See Rehabilitation Job File Checklist (Form 28)
<p>Design Considerations:</p> <ul style="list-style-type: none"> • <i>Are procedures in place for interim and final clearance?</i> • <i>Are relationships in place with clearance examiners and labs?</i> 			
STEP 8: ONGOING MAINTENANCE			
28. If ongoing maintenance is required, is the owner made aware of these requirements?			
29. Are procedures in place to ensure that ongoing maintenance and monitoring take place according to the requirements of the lead safe housing rule?			
<p>Design Considerations:</p> <ul style="list-style-type: none"> • <i>Should ongoing maintenance requirements affect project planning?</i> 			

**Module 6:
Homebuyer Programs**

Module 6: Homebuyer Programs

Module Objectives:

Students will be able to:

- Describe requirements of Lead Safe Housing Rule for Homebuyer programs
- Complete a “lead wellness checklist” to assess their own program compliance
- Develop and share approaches to addressing common challenges faced by Homebuyer programs

Module Overview:

Introduction	<ul style="list-style-type: none">• Homebuyer requirements – what is required and who can do it?• Types of programs effected• Requirements• Homebuyer vs. homebuyer/rehab programs• Homebuyer’s option to test for lead• Key program activities
Exercise 6-1: Lead Wellness	<ul style="list-style-type: none">• Participants work directly with their colleagues to assess their own program compliance using the “lead wellness checklist”• Group discusses questions and clarifies items on checklist
Exercise 6-2: Finding Solutions	<ul style="list-style-type: none">• Participants work in small groups to find solutions to a number of scenarios.• Each group prepares answers to one scenario to share with the large group.• Large group shares and discusses answers.
Wrap-up	

Module 6: Homebuyer Programs

List of Useful Resources

Resource	Where to Find It
1. Lead Safe Housing Requirements Screening Worksheet	Form 5
2. Guidance on The Homebuyer's Option to Test for Lead-Based Paint and Lead-Based Paint Hazards	Form 37
3. Disclosure Form—Sales	Form 3
4. Protect Your Family From Lead in Your Home pamphlet	Form 1
5. Sample Notice of Lead Hazard Reduction	Form 23
6. Sample Clearance Report	Form 22
7. Clearance Report Review Worksheet	Form 21
8. Sample Seller Certification (Homebuyer Program)	Form 40
9. Sample Notice to Lenders, Realtors, and Title Companies on the Lead Safe Housing Rule	Form 39
10. Homebuyer Program Lead Compliance Document Checklist	Form 38
11. Lead Paint Clearance Testing Reimbursement for HOME and CDBG Grantees	Form 50
12. Clearance Protocol for HUD-Assisted Properties	Form 51
13. <i>Chapter 6: Addressing Lead-Based Paint in Homebuyer Programs</i>	Reference Manual Chapter 6

Module 6

Homebuyer Programs

Lead Based Paint Implementation Training

Learning Objectives

At the end of this module, students will be able to:

- Describe requirements of the Lead Safe Housing Rule for homebuyer programs
- Complete a "lead wellness checklist" to assess program compliance
- Develop and share approaches to addressing common homebuyer program challenges

Lead Based Paint Implementation Training
Homebuyer Programs

Programs Affected

- Homebuyer programs funded by:
 - HOME
 - CDBG
- Potential homebuyer assistance programs:
 - ✓ Downpayment assistance
 - ✓ Closing cost assistance
 - ✓ Loan guarantee
 - ✓ PMI assistance See Reference Manual Chapter 6
 - ✓ Subsidized interest rates
 - ✓ Finance acquisition

Lead Based Paint Implementation Training
Homebuyer Programs

Requirements

Approach	Identify and Address Deteriorated Paint
Notification	Yes
Evaluation	Visual Assessment
Reduction	Paint Stabilization Safe Work Practices and Clearance
Ongoing Maintenance	No
EIBLL Requirements	No

Lead Based Paint Implementation Training
Homebuyer Programs

6-4

Option to Test for Lead-Based Paint

- All buyers have 10 day option to test for lead-based paint
 - Risk assessment or paint inspection
- If evaluation shows lead based paint, buyer can get out of the contract
- Program design should take this into consideration

See Form 37: Guidance on The Homebuyer's Option To Test For Lead-Based Paint and Lead-Based Paint Hazards

Lead Based Paint Implementation Training
Homebuyer Programs

6-5

Key Program Activities: Homebuyer

- Pre-purchase counseling
- Application
- Home selection
- Purchase contract
- Inspection
- Purchase negotiation
- Pre-closing
- Loan closing
- Post-purchase counseling

See Reference Manual Exhibit 6-2

Lead Based Paint Implementation Training
Homebuyer Programs

6-6

Is this a homebuyer project?



- The Carters receive HOME-assistance to purchase a home. The forgivable loan includes funds for downpayment assistance and for repairs needed to bring the property to code.
- The Greens received downpayment assistance through the City's HOME-funded Homebuyer program. They select a home that was rehabilitated by ABC Housing using CDBG funds. ABC rehabs homes and puts them on the open market.

Lead Based Paint Implementation Training
Homebuyer Programs

6-7

Exercise 6-1: Lead Wellness



- Work with your colleagues
- Answer each question for your homebuyer program
- See comments column for additional resources
- You have 15 minutes

Lead Based Paint Implementation Training
Homebuyer Programs

6-8

What are your biggest challenges?



Lead Based Paint Implementation Training
Homebuyer Programs

6-9

Common Challenges

- Working with realtors and lenders
- Communicating requirements to sellers
- Meeting notification/recordkeeping requirements
- Addressing rehabilitation needs of properties with lead based paint
- Helping buyers with option to test
- Educating homebuyers
- Educating buyers upfront about requirements of the program

Lead Based Paint Implementation Training
Homebuyer Programs

6-10

Exercise 6- 2: Finding Solutions

- Work in groups
- Read all scenarios
- Answer all questions
- Be prepared to report the answer to one scenario (assigned)
- You have 15 minutes

Lead Based Paint Implementation Training
Homebuyer Programs

6-11

Wrap Up

You now know:

- Lead Safe Housing requirements for Homebuyer Programs
- Compliance issues in your program
- Steps you can take to facilitate compliance

Lead Based Paint Implementation Training
Homebuyer Programs

6-12

Homebuyer Exercise 6-1 Lead Wellness Checklist			
	Yes	No	Comments
Pre-Purchase Counseling			
1. If your agency has a contract with another agency to provide pre-purchase counseling, have the counselors been briefed about the Lead Safe Housing Rule (LSHR) requirements?			
Notices and Information			
2. Does the buyer always receive the following prior to signing the contract?			
a. Lead Hazard Information Pamphlet			See Form 1, Protect Your Family From Lead in Your Home
b. Disclosure Form			See Form 3 for Disclosure Form-Sales
c. Information on their right to request a lead hazard evaluation			See Form 37 for Guidance on The Homebuyer's Option to Test for Lead-Based Paint and Lead-Based Paint Hazards
3. Is receipt of the three items above documented in the project file?			
Evaluation/Inspection			
4. If the home is exempt from the Lead Safe Housing Rule, is this documented in the project file?			See Form 5 for Lead Safe Housing Requirements Screening Worksheet
5. If the homebuyer receives additional assistance for rehabilitation, are the requirements of Subpart J followed?			See Reference Manual Chapter 4 for guidance on Subpart J
6. Does the home inspection include a visual assessment for deteriorated paint?			
7. If the potential home is a condominium, does the visual assessment include common areas?			
8. Is the person performing the inspection trained in visual assessment?			For training on visual assessments, see www.hud.gov/offices/lead/lbptraining
9. Are the visual assessment results documented on the inspection form (HQS or equivalent)?			For sample HQS form, see http://www.hudclips.org/sub_nonhud/html/pdfforms/52580-a.pdf

Lead Hazard Reduction			
10. If the visual assessment reveals deteriorated paint does paint stabilization occur?			
11. Is the paint stabilization (above the de minimis) conducted by qualified workers using safe work practices?			
12. Do you have procedures to document that work was done by qualified workers using lead safe work practices?			See Form 40 for Sample Seller Certification (Homebuyer Program)
13. Is clearance performed after any paint stabilization activity occurs?			See Form 22 for Sample Clearance Report See Form 21 for Clearance Review Report Worksheet
14. Is clearance performed by a qualified person?			
15. Does the homebuyer receive a Notice of Lead Hazard Reduction (including clearance results) within 15 days of the completion of the work?			See Form 23 for Sample Notice of Lead Hazard Reduction
16. Does approval of the home for occupancy occur after the unit passed clearance?			
Documentation			
17. Have you documented your compliance with all the lead-based paint requirements in the homebuyer file?			See Form 38 for Homebuyer Program Lead Compliance Document Checklist
18. Are all documents related to compliance with the lead requirements kept for at least 3 years after closing?			

Exercise 6-2: Finding Solutions

You work for the city of Leadville in the Community Development Department. Read each of the following scenarios and think about how you would address each one. Provide answers in space provided.

1. A homebuyers' program is operated by a nonprofit. They work with a lender, who refers families who have applied for a mortgage and appear to qualify for assistance. The first time the nonprofit sees the family is when they already are trying to buy a specific house.
 - a. Given the lead requirements, would you restructure the program?
 - b. What information should the nonprofit be providing to lenders and realtors in advance about the Lead Safe Housing Rule to encourage their continued participation?

2. Leadville is in Minnesota. In January, a realtor refers Tom and Susan to you for assistance. They have found a house built in 1950. A visual assessment reveals chipping paint on the exterior and in the second floor bathroom. The Leadville Housing Division's program recognizes that virtually all houses that come into the program will contain lead-based paint (hence, the name of the town) and does not encourage homebuyers to look for other houses. How do you proceed with this particular house? Remember, it is January in Minnesota.

3. A city council member complains on behalf of one of his elderly constituents who is selling her home to a family getting homebuyer's assistance. "The family wanted the property tested for lead-based paint. Who's going to pay for the test?" the councilman asks. "And what if there is lead in the paint? If the property is well maintained, is there a problem?" What do you say?

Exercise 6-2: Finding Solutions Continued

4. During an inspection of a 1950's home being purchased by a young family with down payment assistance, you note the property passes all housing standards, but there is the distinct odor of fresh paint in all the rooms.
 - a. Do you investigate why the seller just painted?
 - b. What can you tell the homebuyers about ongoing maintenance of their home?

5. Buddy and Barbara want to buy a house built in the thirties that has deteriorated paint in several rooms. The seller is unwilling to pay for the work and Buddy and Barbara already are receiving the maximum down payment allowed under the program. The market for houses in the right price range is very hot. What could you do if you wanted to help the buyers?

Module 7: TBRA Programs

Module Objectives:

At the end of this module, students will be able to:

- Describe requirements of the Lead Safe Housing Rule for TBRA programs
- Complete a “lead wellness checklist” to assess their own program compliance
- Develop and share approaches to addressing common challenges faced by TBRA programs

Module Overview:

Introduction	<ul style="list-style-type: none">• TBRA requirements—what is required and who can do it?• EIBLL requirements• Ongoing maintenance• Key program activities
Exercise 7-1: Lead Wellness	<ul style="list-style-type: none">• Participants work directly with their colleagues to assess their own program compliance using the “lead wellness checklist.”• Participants discuss which parts of the checklist were the most challenging
Exercise 7-2: Finding Solutions	<ul style="list-style-type: none">• Participants will work in groups.• Each group must choose (or be assigned) a challenge identified in the debrief of Exercise 7-1.• They must answer the questions posed by Exercise 7-2 and come up with action steps for addressing their challenge.• They should list their answers on a flipchart so that they can later do a gallery walk.
Gallery Walk	<ul style="list-style-type: none">• Participants do a short “Gallery Walk.”• Large group discusses good ideas they saw during the Gallery Walk.
Wrap Up	

Module 7: TBRA Programs

List of Useful Resources

Resource	Where to Find It
1. Lead Safe Housing Requirements Screening Worksheet	Form 5
2. Sample Instructions for Owners of TBRA Units	Form 41
3. Sample TBRA Owner Certification	Form 42
4. Sample Clearance Report	Form 22
5. Lead Paint Clearance Testing Reimbursement for HOME and CDBG Grantees	Form 50
6. Clearance Protocol for HUD-Assisted Properties	Form 51
7. Disclosure Form--Rentals	Form 2
8. Sample TBRA Resident Instructions	Form 43
9. Guidance on Relocation	Form 34
10. Sample Notice of Lead Hazard Reduction	Form 23
11. TBRA Sample Letters to Health Department	Forms 45 and 46
12. TBRA Program Lead Compliance Document Checklist	Form 44
13. <i>Chapter 5: Addressing Lead-Based Paint in TBRA Programs</i>	Reference Manual Chapter 5

Module 7

Tenant Based Rental Assistance (TBRA) Programs

Lead Based Paint Implementation Training



Learning Objectives

- At the end of this module, students will be able to:
 - Describe requirements of the Lead Safe Housing Rule for TBRA programs
 - Complete a “lead wellness checklist” to assess program compliance
 - Develop and share approaches to addressing common TBRA challenges

Lead Based Paint Implementation Training
Tenant Based Rental Assistance

7-2



TBRA Programs Affected

- TBRA Programs Funded by:
 - HOME
 - HOPWA
 - Shelter Plus Care (S+C)
- Other HUD programs that provide TBRA
 - Section 8 of the US Housing Act of 1937
 - Indian Housing Block Grant Program
- Properties Reference Manual Chapter 5
 - Occupied by children under age 6
 - Pre-1978

Lead Based Paint Implementation Training
Tenant Based Rental Assistance

7-3



TBRA Requirements

Approach	Identify and Address Deteriorated Paint
Notification	Yes
Evaluation	Visual Assessment
Reduction	Paint Stabilization
	Safe Work Practices and Clearance
Ongoing Maintenance	Yes
EIBLL Requirements	Yes

Lead Based Paint Implementation Training
Tenant Based Rental Assistance

7-4

Ongoing Maintenance

- Establish procedures to track and document:
 - New children under age 6
 - Ongoing maintenance to control hazards
 - Periodic inspections (including visual assessment)
 - Inspection findings corrected
- Maintain required records

Lead Based Paint Implementation Training
Tenant Based Rental Assistance

7-5

EIBLL Requirements

- Share and compare data quarterly
- When report of EIBLL child is received:
 - Verify and report to health department
 - Conduct risk assessment and notify occupants
 - Perform interim controls or abatement
 - Conduct clearance

Reference Manual Chapter 5

Lead Based Paint Implementation Training
Tenant Based Rental Assistance

7-6

Key Program Activities: TBRA

- Application
- Unit inspection
- Inspection findings corrected
- Execution of agreement and rental documents
- Ongoing responsibilities

Reference Manual Chapter 5
Exhibit 5-2

Lead Based Paint Implementation Training
Tenant Based Rental Assistance

7-7

Exercise 7-1: Lead Wellness

- Work with your colleagues
- Answer each question for your TBRA program
- See comments column for additional resources
- You have 15 minutes

Lead Based Paint Implementation Training
Tenant Based Rental Assistance

7-8

What are your biggest challenges?

Lead Based Paint Implementation Training
Tenant Based Rental Assistance

7-9

Common Challenges

- Communicating with owners
- Monitoring owner compliance
- Retaining owners in the program
- Meeting notification/recordkeeping requirements
- Meeting ongoing maintenance requirements
- Relocating residents when necessary

Lead Based Paint Implementation Training
Tenant Based Rental Assistance

7-10

Exercise 7-2: Finding Solutions

- Choose the challenge that interests you
- Work in groups
- Discuss the challenge
- Answer the questions in Exercise 7-2
- List your answers on a flipchart
- Be prepared to report out your answers
- You have 15 minutes

Lead Based Paint Implementation Training
Tenant Based Rental Assistance

7-11

Wrap-Up

You now know:

- Lead Safe Housing requirements for TBRA
- Compliance issues in your program
- Steps you can take to facilitate compliance

Lead Based Paint Implementation Training
Tenant Based Rental Assistance

7-12

TBRA – Exercise 7-1 Lead Wellness Checklist			
Answer the following questions for your program. Note resources listed in “comments” column.			
	Yes	No	Comments
Application			
1. Does your program application ask for the ages of children expected to reside in the unit?			
Unit Selection/Inspection			
2. Do you conduct a visual assessment of all pre-78 units with children under age 6?			
3. If the unit is exempt from the lead safe housing rule, is this documented?			See Form 5 for Lead Safe Housing Requirements Screening Worksheet
4. Are the inspectors who conduct the visual assessment trained in visual assessment?			For training, see www.hud.gov/offices/lead/lbptraining
5. Are the visual assessment results documented on the inspection form (HQS or equivalent)?			For HQS form, see http://www.hudclips.org/sub_nonhud/html/pdfforms/52580-a.pdf
6. Is the owner clearly instructed to stabilize all deteriorated paint?			See Form 41 for Sample Instructions for Owners of TBRA Units
7. If the owner refuses to stabilize deteriorated paint, is the unit denied approval?			
8. Is owner clearly instructed that workers who perform paint stabilization above the de minimis must be qualified (i.e. trained or supervised) and must use safe work practices?			See Form 41 for Sample Instructions for Owners of TBRA Units
9. Do you have procedures to document that work was done by qualified workers using lead safe work practices?			See Form 19 for Post Construction Safe Work Certification
10. Is clearance performed in all units where paint stabilization on areas above the de minimis occurred?			See Form 42 for Sample TBRA Owner Certification
11. Are all clearance reports evaluated to ensure that no deteriorated paint or lead contaminated dust was found?			See Form 21 for Clearance Report Review Worksheet
12. Does approval of the unit for occupancy occur after the unit passed clearance?			
Rental Documents/Payments			
13. When a resident signs the lease, does he/she receive a copy of the pamphlet and a disclosure form?			See Form 2 for Disclosure Form-Rentals. This form also documents the receipt of the pamphlet
14. Are residents instructed to report any deteriorated paint or damage to painted surfaces?			See Form 43 for Sample TBRA Resident Instructions

<p>15. If recertification shows a child under six in a TBRA unit where there was none before, do you:</p> <ul style="list-style-type: none"> → Conduct a visual assessment? → Conduct paint stabilization on deteriorated paint? → Make repairs using safe work practices? → Use properly trained or supervised workers? → Perform clearance? → Provide a notice of lead hazard reduction to residents? 			<p>See Reference Manual Chapter 5 for requirements</p>
Ongoing Maintenance			
<p>16. Have owners been instructed to perform ongoing maintenance?</p>			<p>See Form 41 for Sample Instructions for Owners of TBRA Units</p>
<p>17. Does the agency perform annual visual assessments?</p>			
<p>18. If a visual assessment reveals deteriorated paint, is the owner instructed to perform paint stabilization (using safe work practices)?</p>			<p>See Form 41 for Sample Instructions for Owners of TBRA Units</p>
<p>19. Does the agency have a relocation policy for addressing situations where residents must leave the unit while ongoing maintenance work is performed?</p>			<p>See Form 34 for Guidance on Relocation</p>
<p>20. Is clearance performed after ongoing maintenance activities that involve paint stabilization on surfaces above the de minimis?</p>			
<p>21. Does the agency retain clearance reports following all ongoing maintenance activities documenting that the unit passed clearance?</p>			
<p>22. Does the owner provide a notice of lead hazard reduction after ongoing maintenance disturbs painted surfaces?</p>			<p>See Form 23 for Sample Notice of Lead Hazard Reduction</p>
Environmental Intervention Blood Lead Levels			
<p>23. Do you have procedures in place to share data quarterly on poisoned children with the local health department?</p>			<p>See Forms 45 and 46 for TBRA Sample Letters to Health Department</p>
<p>24. When a poisoned child is identified in a TBRA unit, do you have procedures in place to ensure that a risk assessment and lead hazard control activities are done?</p>			
Documentation			
<p>25. Have you documented your compliance with all the lead-based paint requirements in the tenant file?</p>			<p>See Form 44 for TBRA Program Lead Compliance Document Checklist</p>
<p>26. Are all documents related to compliance with the lead requirements kept for at least 3 years?</p>			

Exercise 7-2: Finding Solutions

Consider the challenge you have been presented. For this challenge, answer the following questions. Be as precise as possible.

Be prepared to share your answers with the group. Jot down your answers in the space below. Then transfer them to a flipchart – write in a large, legible format that will allow others to read it and understand your ideas.

1. Who needs to be involved in the solution to this challenge?
2. What resources do you need? (Training for staff/contractors? New forms? New procedures? Funding? Other?)
3. Where can you find these resources?
4. What are the first four action steps you will take?

Module 8: Special Needs Housing Programs

Module Objectives:

Students will be able to:

- Describe requirements of Lead Safe Housing Rule for Special Needs programs
- Determine the applicable subpart of the rule for a given Special Needs activity
- Identify the first steps to take in implementing the Lead Safe Housing Rule in local Special Needs programs

Module Overview:

Introduction	<ul style="list-style-type: none">• Programs affected• Key actors• Requirements
Exercise 8-1: How is This Project Affected?	<ul style="list-style-type: none">• The exercise consists of scenarios. Participants must make a judgment about whether the particular scenario is exempt from the rule or not. If not exempt, the group must identify the applicable subpart (J, K, or M)• Participants post their answers onto a flipchart.• Discussion of correct answers.
Sharing Experiences	<ul style="list-style-type: none">• Participants discuss a series of questions on their experiences – the people involved in the process, the requirements, etc.
Wrap-up	

Module 8: Special Needs List of Useful Resources

Resource	Where to Find It
1. Sample Instructions for Nonprofits	Form 47
2. Sample Owner Certification for Special Needs Project	Form 48
3. Special Needs Program Compliance File Checklist	Form 49
4. Disclosure Form—Rentals	Form 2
5. Lead Safe Housing Requirements Screening Worksheet	Form 5
6. Sample Notice of Lead Hazard Reduction	Form 23
7. Clearance Report Review Worksheet	Form 21
8. Lead Paint Clearance Testing Reimbursement for HOME and CDBG Grantees	Form 50
9. Clearance Protocol for HUD-Assisted Properties	Form 51
10. <i>Chapter 7: Addressing Lead-Based Paint in Special Needs Housing Programs</i>	Reference Manual Chapter 7
11. Attachment 7:A Summary of Special Needs Housing Programs	Reference Manual Chapter 7

Module 8

Special Needs Housing Programs

Lead Based Paint Implementation Training

Learning Objectives

At the end of this module, students will be able to:

- Describe requirements of the Lead Safe Housing Rule for special needs programs
- Determine if funded activities are exempt or what subpart is applicable
- Identify first steps towards lead compliance

Lead Based Paint Implementation Training
Special Needs Housing Programs

8-2

Programs Affected

- Special Needs Programs Funded by:
 - HOME, CDBG, HOPWA, SHP, S+C, ESG
- Programs may include:
 - Acquisition or leasing of residential property
 - Support services and operations
 - Rehabilitation
 - Tenant Based Rental Assistance

[See Reference Manual Chapter 7](#)

Lead Based Paint Implementation Training
Special Needs Housing Programs

8-3

Key Actors

- Grantees
 - State, city and county governments
- Administering agencies
 - City and county governments
 - Nonprofit agencies
- Program participants:
 - Occupants
 - Property Owners

Lead Based Paint Implementation Training
Special Needs Housing Programs

8-4

Special Needs Housing- Requirements

- May be subject to:
 - Subpart J: Rehab
 - Subpart K: Acquisition, Leasing, Support Services, and Operations
 - Subpart M: TBRA
- Often exempt

See Reference Manual Chapter 7,
Attachment 7-A

Lead Based Paint Implementation Training
Special Needs Housing Programs

8-5

Exercise 8-1: How is this project affected?

- Read the scenario(s) assigned to your group
- Decide if exempt or non-exempt
- If non-exempt, determine subpart applicable
- Record on flipchart
- Be prepared to explain your answer
- You have 5 minutes

Lead Based Paint Implementation Training
Special Needs Housing Programs

8-6

Discussion: Sharing Experiences



- Who is involved in implementing special needs programs?
- What are the challenges?
- How do you ensure compliance?

Wrap-Up



You now know how to:

- Determine if a project is affected
- Determine which requirements apply
- Adjust program procedures to comply

Special Needs Housing—Exercise 8-1 How is this project affected?

1. Read the scenario(s) assigned to your group.
2. Decide if they are exempt or non exempt. Record the answer on your worksheet.
3. Discuss with your group the reasons why it is exempt or nonexempt. Record the answer on your worksheet.
4. If it is not exempt, determine the subpart (J, K, or M) that applies. Record the answer on your worksheet.
5. Go to the flipchart at the front of the room. Put the letter for your scenario in the correct column (exempt or non-exempt).
6. Be prepared to explain your answer to the large group.
7. If you finish early, try answering some of the other scenarios.

	Scenarios	Exempt or Non-exempt ?	Explanation (Subpart J, K, or M?)
A	A housing developer seeks funding to acquire and rehabilitate a large 15-room home that will house 12 mentally ill individuals. The developer is planning to use Supportive Housing Program funds in conjunction with HOME funds.		
B	Helping Hands, Inc. provides a homeless shelter to single mothers with children. Each family occupies a two-bedroom unit. The shelter typically places families into permanent housing within 90 days, but immediately fills the unit with another family. Emergency Shelter Grant program funding is used for operations, leasing and supportive services.		
C	A 20-unit property for formerly homeless veterans is being acquired and rehabilitated in the town of Chippewa Falls. The units are all single room occupancy dwellings with kitchen and bathroom facilities.		
D	A town in the Northeast determines that one reason why the homeless population has been increasing is due to escalating costs for security deposits, sometimes 2-3 months of funds are needed upfront. The jurisdiction would like to fund the new program with their HOME funds.		

	Scenarios	Exempt or Non-Exempt	Explanation (Subpart J, K, or M?)
E	The county’s main provider of social services for those with HIV and AIDS is funded each year under the Community Development Block Grant program for their “mobile outreach program.” This program provides for mobile services such as medical care, nutrition services, and “meals on wheels.”		
F	A nonprofit has applied for HOME funds to acquire and convert a warehouse into transitional housing comprised of 2-bedroom units for families.		
G	A local community action agency provides housing counseling to clients who are homeless or living in transitional housing, because they need permanent housing. Community Development Block Grant funds make up the bulk of the budget for this program.		
H	A church sponsored community development corporation is looking to find shelter space for a “safe haven” for chronic inebriates and other hard to serve homeless populations. The building they are looking to acquire with Supportive Housing Program funds is an old gymnasium at a closed prep school. The church plans to provide nightly meals and beds in the gymnasium.		

	Scenarios	Exempt or Non-Exempt	Explanation (Subpart J, K, or M?)
I	The County's Continuum of Care application process is underway and a request for proposals is advertised for projects. In response to the RFP, The Salvation Army is seeking funds for operations and supportive service components for a transitional housing development for single individuals. The housing will consist of 1-bedroom units with an eat-in kitchen. Supportive services include GED classes, computer learning skills, job-readiness, and home-budgeting classes.		
J	Assisted Living, Inc. is rehabilitating a 45-unit development for the elderly in the Williamstown neighborhood using HOME and Section 202 funds. The development will include 1-bedroom units and efficiencies along with supportive services for residents.		
K	The City of Westview runs a homeless prevention program using CDBG funds. The program provides emergency rental payments for up to three consecutive months for families who can't pay their rent and are at-risk of becoming homeless.		
L	The Food and Shelter Foundation in Frozen Lake, Michigan uses ESG funds to rent rooms in the local motel to provide shelter to homeless families during the coldest months of the year. Because the temperature can be below freezing from October through March in Frozen Lake, these rooms are often rented continuously for 6 months.		

OPTIONAL Exercise 8-2: Applying the Lead Safe Housing Rule to a Special Needs Program

Use the scenario below or use your own program to answer the questions below.

Scenarios:

The Allentown Community Action Agency (CAA) is the primary provider of homeless housing and services for Allen County. Under its Families Forward Program, the CAA acquires buildings and provides supportive services for families living in a transitional living environment. Families Forward is a holistic program that provides both housing units as well as supportive services such as GED classes, drug and alcohol abuse counseling, child care, after-school care, and job readiness. While the program is administered by CAA staff, the housing units are managed by a private sector firm, Managers R Us, who have extensive experience in maintenance. Funding for Families Forward has typically come from large national organizations such as the United Way as well as from foundations. Under Allentown's Continuum of Care application in 2001, Families Forward was awarded Supportive Housing Program (SHP) funds for operations and supportive services. This is the first time that this program has received Federal Funds.

1. Which subpart of the Lead Safe Housing Regulation applies to this program (Subpart J, K, or M?)

2. List the actors involved in this program.

3. What needs to be done immediately to comply with the Lead Safe Housing Rule?

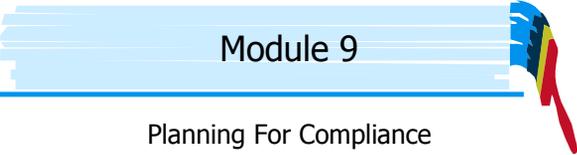
4. What needs to be done on an ongoing basis?

5. Who is responsible for the activities listed above:

Module 9

Planning For Compliance

Lead Based Paint Implementation Training



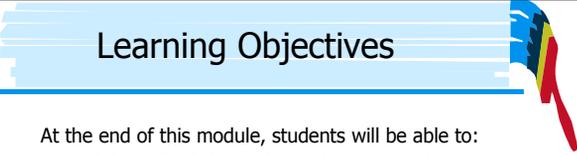
Learning Objectives

At the end of this module, students will be able to:

- List the first ten steps they will take when they get home
- See the glass half full
- Take the message back home

Lead Based Paint Implementation Training
Planning for Compliance

9-2

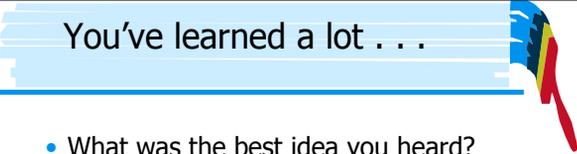


You've learned a lot . . .

- What was the best idea you heard?

Lead Based Paint Implementation Training
Planning for Compliance

9-3



You've collected resources. . .

- What tools are most useful?
- What will you use when you get home?

Lead Based Paint Implementation Training
Planning for Compliance

9-4

Now, take the message home

- Who will you meet with back home?

Lead Based Paint Implementation Training
Planning for Compliance

9-5

Meeting Agenda

- Program procedures
- Program design
- Training needs
- Outreach needs
- Resources available
- Impact on production

Lead Based Paint Implementation Training
Planning for Compliance

9-6

An Action Plan

What are the first 10 things you will do when you get home?

1.	6.
2.	7.
3.	8.
4.	9.
5.	10.

Lead Based Paint Implementation Training
Planning for Compliance

9-7

Housing History

- Gas heat
- Indoor plumbing
- Electricity
- Smoke detectors
- Lead-safe housing

Lead Based Paint Implementation Training
Planning for Compliance

9-8

Wrap-Up

- Know what is in the rule – 24 CFR 35
- Use your resources
 - Student Manual
 - Sample Forms
 - HUD
 - Local agencies and Lead Grantees
- Take this message home

Lead Based Paint Implementation Training
Planning for Compliance

9-9
