



**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT**  
WASHINGTON, D.C. 20410-3000

OFFICE OF HEALTHY HOMES AND  
LEAD HAZARD CONTROL

<b>POLICY GUIDANCE NUMBER:</b>	<b>2004-01</b>	<b>DATE:</b>	<b>December 21, 2004</b>
<b>SUBJECT:</b>	<b>Revised Work Plan development guidance</b>		
<b>STATUS:</b>	<b>Current</b>		
<b>APPLICABILITY:</b>	<b>All grant rounds</b>		
<b>RELATED GUIDANCES:</b>	<b>Supersedes “Work Plan Guidance” in PGI 2001-03 (October 1, 2001)</b>		
<b>COMMENTS:</b>			

Dear Lead-Based Paint Hazard Control Grantee:

The purpose of this letter is to revise the Office of Healthy Homes and Lead Hazard Control’s (OHHLHC) policy regarding work plan development requirements for grantees that receive lead hazard control funding through the NOFA process.

The Office of Healthy Homes and Lead Hazard Control (OHHLHC) has created a new *Safe and Healthy Homes Community* initiative. A *Safe and Healthy Homes Community* is a jurisdiction that has demonstrated a commitment to addressing health and safety issues through housing interventions. This *Community*, with the support of federal agencies, has established an infrastructure to identify and address housing-related health and safety issues locally. This infrastructure facilitates effective working relationships among health departments, housing and community development organizations, code enforcement agencies, and major private-sector stakeholders, to evaluate and control housing-related hazards that pose threats to all residents, particularly children. (Specific guidance related to the establishment of an effective infrastructure will be discussed below.)

Under a jurisdiction’s Consolidated Plan for pursuing goals for community planning and development programs and housing programs, a community is tasked to address lead and other housing-related issues that affect the health of residents. For example, regarding lead safety, the community consults with health and child welfare agencies, examines data on lead hazards and poisonings (including health department data about addresses where children have been identified as lead poisoned), and follows the Lead Safe Housing Rule for reducing hazards in federally assisted housing.

As a result of including lead hazards in implementing its strategic planning element of the Consolidated Plan, the community identifies properties, evaluates hazards, reduces these hazards, and integrates this effort into housing policies and programs. The community considers not only

housing where children have been identified as lead poisoned, but also housing that pose risks of creating future lead poisoning. The community's Annual Action Plan—that implements the Strategic Plan—also identifies obstacles for evaluating and reducing lead-based paint hazards in housing and implements its strategy to address these hazards.

While the OHHLHC is aware that many communities are already actively participating with other federal, state, and local agencies to implement the requirements of your jurisdiction's Consolidated Plan, we ask that your work plan demonstrate that the implementation of, or plans to implement, the various issues identified above is occurring. In short, your work plan will either describe steps that need to be taken to become a *Safe and Healthy Homes Community* as noted above or document the specific actions that demonstrate your community is already a *Safe and Healthy Homes Community*.

Your work plan will be submitted to the Government Technical Representative (GTR) and should consist of the goals and specific time-phased objectives established for each of the major activities and tasks required to implement the program. These major activities and tasks are outlined in the Quarterly Progress Reporting System (Form-HUD-96006) and include: 1) Program Management and Capacity Building including data collection and program evaluation; 2) Community Education, Outreach and Training; and 3) Lead Hazard Activities including testing, interventions conducted, and relocation.

In addition to these basis elements, we are asking that you provide documentation that addresses your jurisdiction's Consolidated Plan for pursuing goals for community planning and development programs and housing programs, the Community is tasked to address lead and other housing-related issues that affect the health of residents.

*NOTE: Approval of the work plan by the GTR and HUD approval of the Release of Funds Request (HUD Form 7015.15) are required prior to conducting lead hazard control intervention work in homes.*

**The work plan shall include:**

- The management plan that describes how the project will be managed, and the timeline for staffing the program, establishing a lead-based paint contractor pool, and obtaining HUD approval for the Release of Funds Request (HUD Form 7015.15);
- You should provide documentation that addresses your jurisdiction's Consolidated Plan for pursuing goals for community planning and development programs and housing programs, the Community is tasked to address lead and other housing-related issues that affect the health of residents. The Notice of Funding Availability (NOFA) under which you received federal funding requires that your program submit “a copy of the lead hazard control element included in your current program year's Consolidated Plan. (This does not apply to Native American Tribes) You should include the discussion of any lead-based paint issues in your jurisdiction's Analysis of Impediments, particularly as it addresses your target areas.” In accordance with the requirements set forth in the NOFA, your work plan must include a detailed strategy to:
  - Obtain data on the addresses of housing units in which children have been identified as lead poisoned, as required by 24 CFR 91.100 (a)(2);

- Formalize commitments, or provide documentation of commitments, with applicable State or local health and child welfare agencies, community development organizations, and housing agencies to partner with the HUD Lead Hazard Control grantee to identify and address childhood lead poisoning in your jurisdiction collaboratively, and describe your methods for coordinating among these agencies.
- Address issues of patient confidentiality raised by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) as it relates to the release of addresses of units where children have been poisoned by lead-based paint hazards within your jurisdiction; in addition, provide thorough details of all security measures to be taken to ensure that the privacy of patient information obtained for the purposes of public health services conducted through the lead hazard control program will be safeguarded.
- Describe how lead hazard units, especially those known to contain EBL children, will be identified, selected, prioritized, and considered for treatment under this grant and/or other programs of the grantee or grantee's partners. You must demonstrate how you consider housing units identified by local health and child welfare agencies where incidences of childhood lead poisoning have occurred, particularly those where multiple poisonings have been reported, for enrollment into lead hazard control treatment programs;
  - Demonstration of specific steps and/or actions that will be taken to ensure that other resources in the community are utilized to increase funding, to locate and provide training, and to link with other local programs engaged in lead hazard control activities;
  - Detailed description of how assistance and funding will flow from the grantee to the actual performers of the hazard reduction work;
  - Detailed description of the selection process for sub-grantees, sub-contractors or sub-recipients;
  - Description of the financing mechanism used to support lead hazard control work in units (name of administering agency, eligibility requirements, type of financing (grant, forgivable or deferred loans, private sector financing etc), any owner matching requirement, and the terms, conditions, and amounts of assistance available (include affordability terms and forgiveness and recapture of funds provisions);
  - Combined lead inspection and risk assessment testing procedures using EPA standards to identify lead hazards and to conduct clearance testing. [Dust wipe samples, soil samples and any paint samples to be analyzed by a laboratory must be analyzed by a laboratory recognized by the EPA National Lead Laboratory Accreditation Program (NLAPP)];
  - The process for developing work specifications and bids on properties selected for lead hazard control;
  - The specific levels of intervention and clearance procedures to be conducted for units enrolled;
  - The number of rental-occupied, vacant, and owner-occupied units proposed for each intervention level;
  - The relocation plan that will be carried out for residents required to be out of their homes during hazard control activities;
  - The education, outreach, and training activities to be undertaken by the program;
  - The blood lead testing and other health measures to be undertaken to protect children and other occupants of units undergoing lead hazard control work; and

- The evaluation process used to measure program performance, with particular attention given to program performance in the five key areas evaluated by OHHLHC on a quarterly basis: number of units inspected and risk assessed; number of units cleared of lead hazards; the amount of grant funds disbursed through the LOCCS system; the number of persons reached through outreach and education efforts; and, the number of persons trained in lead hazard control courses.

### **Objectives and Milestones**

Using forms HUD-96008 or –96009, as applicable, you must establish specific and measurable performance objectives and milestones to be developed in support of the work plan narrative. These include:

- The overall objectives for Lead Hazard Control activities *by quarter* including the total number of lead hazard evaluations (inspections and risk assessments), the number of units projected to be completed and cleared (HUD Agreement-HUD-1044), and the amount of federally awarded funds (as reported in LOCCS) withdrawn. Quarterly performance milestones are to be developed to achieve the overall objectives for these activities.
- The overall objectives by quarter for Community Education/Outreach, and Training Activities. These objectives are to be identified by Quarterly performance milestones to be developed to achieve the overall objectives for these activities. In establishing quarterly milestones, it is important to provide consistent outcomes for each objective under the Education/Outreach category, (for example, report either events conducted or persons reached, but not both).

SAMPLE  
**GOALS/OBJECTIVES & PERFORMANCE MILESTONES**  
*Lead Hazard Control Grant Program Activities*

The following sample format for the goals/objectives and performance milestones for lead hazard control grant program major tasks and activities may be used by grantees as part of the overall work plan submitted to the Office of Healthy Homes and Lead Hazard Control. Grantees are to develop additional goals/objectives and performance milestones for each major task or activity related to the lead hazard grant program. (For illustrative purposes, the grant program agreement effective date is January 1 of the current year and the total number of units included in the grant agreement is 100)

SAMPLE GOALS/OBJECTIVES & PERFORMANCE MILESTONES	
<i>Total Number of Units to be Completed and Cleared</i>	<i>100</i>
<i>Total Number of Paint Inspections/Risk Assessments to be Conducted</i>	<i>150</i>
<i>Total Number of Training Events to be Conducted</i>	<i>10</i>
<i>Total Number of Health Education and Outreach Events to be Conducted</i>	<i>18</i>

Quarterly Performance Objectives

Goal/Objective:  
Year 1

Units to Be Completed: 100

Quarter	Quarterly Milestone	Completed/Cleared	Cumulative Completed/Cleared
<input type="checkbox"/> <i>JAN - MAR</i>	NA	NA	NA
<input type="checkbox"/> <i>APR - JUN</i>	NA	NA	NA
<input type="checkbox"/> <i>JUL - SEP</i>	5		
<input type="checkbox"/> <i>OCT - DEC</i>	5		

Year 2

Quarter	Quarterly Milestone	Completed/Cleared	Cumulative Completed/Cleared
<input type="checkbox"/> <i>JAN - MAR</i>	10		
<input type="checkbox"/> <i>APR - JUN</i>	15		
<input type="checkbox"/> <i>JUL - SEP</i>	15		
<input type="checkbox"/> <i>OCT - DEC</i>	10		

Year 3

Quarter	Quarterly Milestone	Completed/Cleared	Cumulative Completed/Cleared
<input type="checkbox"/> <i>JAN - MAR</i>	10		
<input type="checkbox"/> <i>APR - JUN</i>	10		
<input type="checkbox"/> <i>JUL - SEP</i>	10		
<input type="checkbox"/> <i>OCT - DEC</i>	10		