



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

OFFICE OF LEAD HAZARD CONTROL
AND HEALTHY HOMES

POLICY GUIDANCE NUMBER: 2016-01	DATE: August 31, 2016
SUBJECT:	Purpose and Use of Healthy Homes Supplemental Funding (HHSupp)
STATUS:	Current
APPLICABILITY:	Lead-Based Paint Hazard Control (LBPHC) and Lead Hazard Reduction Demonstration (LHRD) grantees
RELATED GUIDANCES:	None

What is Healthy Homes Supplemental (HHSupp) funding?

Healthy Homes Supplemental (HHSupp) funding for the Office of Lead Hazard Control and Healthy Homes' (OLHCHH's) lead hazard control grants¹ used for identifying and remediating multiple housing-related health and safety hazards that are not lead-based paint hazards. HHSupp funding comes from the Office's annual budget line for the Healthy Homes Initiative, provided pursuant to sections 501 and 502 of the Housing and Urban Development Act of 1970.

What is the purpose of the HHSupp?

HHSupp funding is part of HUD's comprehensive approach to address housing related health and safety hazards that contribute to diseases and injuries in a coordinated fashion, rather than addressing a single hazard at a time.

What restrictions are there in the use of is HHSupp funds?

HHSupp funding is used for identifying and remediating multiple health and safety hazards in homes. HHSupp funding may only be used in homes where lead hazard control work (interim controls or abatement) is being conducted.

On the other hand, grantees, sub-grantees, and contractors/vendors who receive lead hazard control funds are not required to expend HHSupp funding in every home where they expend lead hazard control funds. The decision is the grantee's (including its sub-grantees and contractors in the decision-making process to the extent the grantee sees fit).

What is the Healthy Homes Rating System (HHRS)?

The Healthy Homes Rating System (HHRS) is used by the OLHCHH for rating (scoring) and

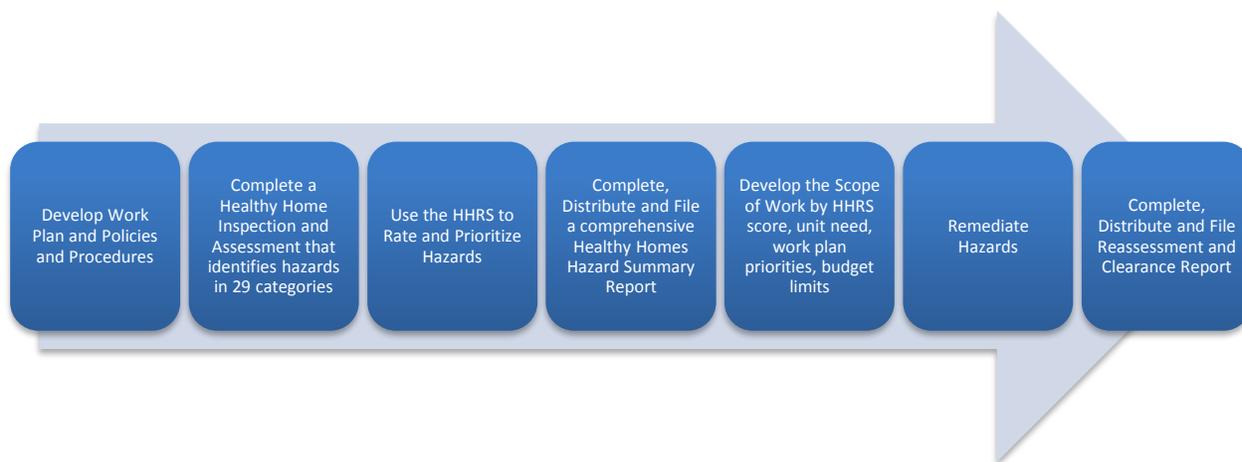
¹ The Office's "lead hazard control grants" are its Lead-Based Paint Hazard Control (LBPHC) Grant Program funds and Lead Hazard Reduction (LHRD) Grant Program.

prioritizing health and safety hazards in a home based on their possible health effects.² Successful use of HHRS is dependent on a complete inspection and assessment of a home that identifies at least all 29 hazards categories listed in HHRS. For a list of resources regarding HHRS, see the “Helpful Resources” section of this policy guidance.

Under HHRS, a home inspection is defined as the technical and analytical inspection by room for residential problem areas that contribute toward one or more of HHRS’ 29 home hazard categories. Residential problems would include: water leaks, holes in floors, signs of pests, no electrical wiring, etc. The HHRS home assessment is similar to a lead based paint risk assessment in that it should utilize the analytical information from the room by room inspection to connect the inspection results to any unique characteristics of the homes location, materials, use patterns and layout that would contribute to the potential risk of injury that could be posed by the home hazard assessed. Examples of the 29 HHRS hazard categories to connect residential housing problems to include: dampness and mold growth, falls on level, cold, lead, fire hazard, etc.

What is the process for remediating hazards using HHSupp funding?

The diagram below represents the process for identifying and remediating health and safety hazards in homes using HHSupp funding.



- (1) **Grant Work Plan and Policies and Procedures.** Grantees that receive HHSupp funding must ensure that the use of those funds is addressed in their grant’s Work Plan and Policies and Procedures. The Work Plan *must* outline a clear process and prioritization strategy for addressing hazards other than lead-based paint hazards. The strategy should include the following information:
- a. Healthy Home Inspection and Assessment Process: A description of the method for completing a healthy home inspection and assessment for identifying hazards, which must be based on:
 - i. At least all 29 hazard categories identified in the HHRS;
 - ii. State and local housing codes and laws impacting environmental health assessment and measurement (See “Helpful Resources” for more information on housing codes and laws); and

² See http://portal.hud.gov/hudportal/HUD?src=/program_offices/healthy_homes/hhrs.

- iii. Other resources available in the community (or the state, if the grant is to the state) that could be aligned with, integrated with, or supplemental to HHSupp funds for inspection and measurement.
- b. **Healthy Homes Inspection and Assessment Methods:** The work plan must include a description of how and when eligible homes will be included for HHSupp funds.
 - i. Detail the process and timelines for inspection, assessment and reports, and
 - ii. Identify qualified staff that will be completing the assessment, scope writing, reassessment and clearance
 - iii. Work plan must clearly state that assessors must inspect and assess homes for the HHRS. Careful consideration should be taken when choosing an inspection and assessment tool that considers staff background and experience to ensure that the tool yields a thorough list of hazards.
 - iv. The tool selected and used must demonstrate assessment and inspection protocol for a minimum of the 29 hazard categories in the HHRS.
- c. **Scope of Work Prioritization of Hazards:** A description of how the grantee's programs will prioritize identified hazards, which must be based on:
 - i. The rating (score) of the hazards identified;
 - ii. The cost of remediation;
 - iii. Current or intended occupants healthy and safety needs
 - iv. Local and state needs and data³;
 - v. State and local housing codes and laws impacting environmental health intervention (See "Helpful Resources" for more information on housing codes and laws); and
 - vi. Other resources available in the community that could be aligned with, integrated with, or supplemental to HHSupp funds for home intervention.

(2) HHRS Rating and Prioritization of Hazards

- a. **HHRS Rating.** At this stage, program staff should provide a rating (score) for all 29 hazards identified based on the home inspection and assessment. OLHCHH has a paper scoring form⁴ and a Microsoft Excel scoring tool⁵ that assessors may use to conduct HHRS ratings and prioritizations. HHRS ratings must be conducted by assessors who have completed an HHRS training course provided either by HUD or by a National Healthy Homes Training Center Partner. The Training Center is operational across the country and provides training on healthy homes topics through the National Center for Healthy Homes and its 48 training partners.⁶ The assessor must complete an HHRS Scoring Report, which must include the date of the inspection and assessment, the assessor's name, all hazards identified, the rating (score) of all hazards, and recommendations for addressing hazards. The HHRS scoring report must be maintained in the case file for the home where lead hazard control funds and HHSupp funds are being expended.

³ For instance, is your county labeled as a "Highest Potential" radon zone by EPA? Are childhood asthma rates high in your local community or state? Do a high number of people in your local community or state visit the Emergency Room for home injuries?

⁴ The paper scoring form is available at http://portal.hud.gov/hudportal/documents/huddoc?id=hhrs_paper_scoring_form.pdf.

⁵ The Microsoft Excel scoring tool is available at http://portal.hud.gov/hudportal/documents/huddoc?id=hhrs_tool.1.xls.

⁶ <http://healthyhousingsolutions.com/hhtc/>

- b. **Prioritization of Hazards.** The prioritization of hazards must be based on the prioritization strategy identified in the grantee's Work Plan. As noted above, the grantee's prioritization strategy must include the rating (score) of the hazards.

(3) **Healthy Homes Hazard Summary Report**

- a. A **Healthy Homes Hazard Summary Report** will be completed, distributed and filed to document all HHSupp activities up to this point in the unit production process. The report will include all unit specific information related to inspection analytics, assessment, a summary of hazards identified, and the HHRS rating for each hazard. The information will be summarized by housing unit and provided to the tenant and owner as applicable. The report is expected to include recommendations to address prioritized hazards identified as well as community resources that can be accessed should the participant choose not to proceed in the HHSupp program after this point. The report will be placed in the unit file and unit assessment findings will be updated in the OLHCHH's Healthy Homes Grant Management System (HHGMS).

(4) **Unit Scope of Work**

- a. A scope of work must be developed from the Healthy Homes Hazard Summary Report that clearly identifies the hazards that have been selected to be remediated, the tasks necessary to complete the remediation, estimated cost of the work (the grantee must use a clearly a separate funding track from all lead award funds), and the materials and required specifications that will be used in the remediation.
- b. The scope of work *must* include interventions based on the prioritization of hazards. However, not all hazards identified in the HHRS assessment are required to be remediated; limitations on the amount of funding will prohibit addressing every hazard in many cases. Scopes of work and any amendments to the scopes of work must be maintained in the case file for the home where the lead hazard control and HHSupp funds are being expended.
- c. Government Technical Representative (GTR) approval is required for before proceeding on any HHSupp remediation work that is estimated to be over \$5,000 per housing unit.
 - i. To request a HHSupp funds in excess of \$5000 per unit; submit a request to your GTR through the HHGMS that includes:
 - 1. The Healthy Homes Hazard Summary Report;
 - 2. A draft scope of work and an in-house estimate of costs; and a
 - 3. Summary of ownership of unit, income, and occupancy
 - ii. Your GTR will review the request and, if necessary, request additional documentation for review. Determinations to proceed will be made based on unit correlation with grantee work plan, benchmark goals and overall benefit of the selected unit justifying the expense and impact on the grant resources.
 - iii. Do not proceed until you receive approval to proceed from your GTR.

- (5) **Remediation of Hazards.** Remediation must be based on the scope of work developed following the home inspection and assessment, and the HHRS rating and prioritization. As with the lead hazard evaluation and control work conducted under the grant, the grantee is

responsible for monitoring the application and interpretation of the HHRS and the performance of the firms or individuals completing hazard remediation work.

- (6) **HHSupp Reassessment and Clearance.** Program personnel must conduct a follow-up inspection and assessment following remediation of repairs limited to the scope of work. Results of the reassessment must be evaluated in HHRS to ensure the hazards were addressed adequately to reduce the risk of injury. The Program Staff must complete a Reassessment and Clearance Report that provides final ratings for the hazards remediated (not for all 29 HHRS hazard categories). The Reassessment and Clearance Report must be maintained in the case file for the home where lead hazard control funds and HHSupp funds are being expended.

What documentation must be provided to owners and occupants?

Any owners and occupants of the home where HHSupp funds were expended must receive the following documentation:

- A copy of the home inspection and assessment;
- A copy of the HHRS Scoring Report;
- A copy of the Reassessment and Clearance Report; and
- A list of resources available in the community to address health and safety hazards.

What costs are allowable for HHSupp funding?

Allowable Costs for HHSupp Funding

Costs that are directly related to the identification, assessment, and remediation of housing-related health and safety hazards are allowable costs for HHSupp funding. Allowable costs include the following and may be included in HHSupp budget by task item:

- Reasonable Rate per unit for completion of:
 - Conducting the home inspection and assessment, including the costs of
 - Inspection equipment; and
 - Secondary inspections as required by the HHRS, including inspections by structural engineers, electrical engineers, and other follow-up investigators;
 - Developing the scopes of work and associated reports;
 - Remediating the hazards identified in the scope of work, including the costs of materials used to remediate hazards (expected average HHSupp Unit Cost);
 - Educational Materials individualized to hazards identified in enrolled housing units
 - Reassessing the completed work;
 - Training (not travel) as required for Healthy Homes Practitioner or HHRS certification for staff tasked with completing assessments, inspections or leadership review of these documents.

Restrictions on Use of HHSupp Funds

A grantee, sub-grantee, or vendor/contractor must **not** use HHSupp funds for the following activities:

- Salaries and Fringe for any persons including those completing eligible tasks set above
- Administrative Cost including Indirect Cost Rate
- Travel

- Outreach and/or Intake
- General (non-housing unit specific) educational materials
- Supplies
 - Supplies outside of the scope of interventions to address hazards identified within individually completed Healthy Homes Hazard Summary Reports.
- Research, studies, or demonstration programs; and
- Any work conducted in homes where lead hazard control work is not being conducted are **not** being used (e.g., in a home for which a lead risk assessment is or was conducted but the grantee decided not to conduct lead hazard control work, such as because no significant lead-based paint hazards were identified, or the cost of controlling lead-based paint hazards would have been more than the grantee chose to allocate to the home, etc.)
- Grantee²s are encouraged to identify additional resources within their communities that can address needs of individual participants that fall outside the scope of HHSupp funds as they are detailed in this document.

Helpful Resources

HHS Resources

- OLHCHH, Overview of the Healthy Homes Ratings System, http://portal.hud.gov/hudportal/HUD?src=/program_offices/healthy_homes/hhrs
- OLHCHH, The Healthy Homes Rating System—Operating Guidance, available at <http://portal.hud.gov/hudportal/documents/huddoc?id=operatingguidanceHHS 1-14.pdf>.
- The Effect of the Defect: Housing Hazards Identified in the Healthy Home Rating System, available at <http://portal.hud.gov/hudportal/documents/huddoc?id=hhrschart.pdf>
- HHS Paper Scoring Form, available at http://portal.hud.gov/hudportal/documents/huddoc?id=hhrs_paper_scoring_form.pdf
- HHS Microsoft Excel Scoring Tool, available at http://portal.hud.gov/hudportal/documents/huddoc?id=hhrs_tool.1.xls.

Housing Codes

- State Housing Codes
 - Healthy Housing Solutions, Housing Codes, <http://healthyhousingsolutions.com/hhtc/state-housing-codes/> (includes a state-by-state directory of housing codes)
 - National Conference of State Legislatures, Healthy Homes, <http://www.ncsl.org/research/environment-and-natural-resources/healthy-homes.aspx> (includes a directory of state laws regarding the health of a home environment)
- Local Ordinances
 - Municode, www.municode.com
 - General Code Library, www.generalcode.com/webcode2.html