Strengthen Environmental Justice

Goal Leader:
Matt Ammon, Director of the Office of Lead Hazard Control and Healthy Homes
Michelle Miller, Deputy Director of the Office of Lead Hazard Control and Healthy Homes
Goal Overview

Goal statement

- By September 30, 2023, protect families from lead-based paint and other health hazards by making an additional 20,000 units of at-risk housing units healthy and lead-safe.

Problem to Be Solved

- Young children are especially at risk of the harmful effects of lead, from which even low-level exposure can increase the likelihood of behavioral problems and learning disabilities. At high levels, seizures, and in extreme cases, death can occur.
- Exposure to other home environmental hazards, such as mold, radon, and pests, are linked to chronic health conditions like asthma and cancer.

What Success Looks Like

- The removal and prevention of lead-based paint hazards and other housing-related health and safety hazards, will contribute to a significant decline in blood-lead levels among US children.
## Goal Targets

<table>
<thead>
<tr>
<th>By…</th>
<th>We will…</th>
<th>Key indicator(s)</th>
<th>Quantify progress</th>
<th>Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>9/30/23</td>
<td>Protect families from lead-based paint and other health hazards</td>
<td>Making an additional 20,000 units of at-risk housing units healthy and lead-safe.</td>
<td>20,000</td>
<td>4,887</td>
</tr>
</tbody>
</table>
## Goal Team

### Office of Lead Hazard Control and Healthy Homes (OLHCHH)

**Senior Lead:**
- Matt Ammon (Director)

**Team Leads:**
- Michelle Miller (Deputy Director)
- Warren Friedman (Senior Advisor)
- Bruce Haber (Director, Program and Regulatory Support Division)
- Yolanda Brown (Director, Lead and Healthy Homes Programs Division)
- Deborah Roane (Director, Grants Services Division)
- Brenda Reyes (Acting Director, Policy and Standards Division)

### Office of Community Planning and Development (CPD)

**Team Leads:**
- Kevin Bush (Deputy Assistant Secretary for Grant Programs)
- Robin Keegan (Deputy Assistant Secretary for Economic Development)
- Virginia Sardone (Director, Office of Affordable Housing Programs)
- Jessie Kome (Director, Office of Block Grant Assistance)
- Rita Harcrow (Director, Office of HIV/AIDS Housing)
- Lauren McNamara (Acting Director, Office of Environment and Energy [OEE])

### Office of Multifamily Housing Programs (MFH)

**Team Leads:**
- Ethan Handelman (Deputy Assistant Secretary for Multifamily Housing)
- Jeffrey Little (Associate Deputy Assistant Secretary for Multifamily Housing)
- Toby Halliday (Director, Multifamily Asset Management and Portfolio Oversight)
- Michael Bruggman (Director, Asset Management and Counterparty Oversight Division)
- Jamal Bouaichi (Senior Advisor, MF OAMPO)

### Office of Public and Indian Housing (PIH)

**Team Leads:**
- Dominique Blom (General Deputy Assistant Secretary for Public and Indian Housing)
- Danielle Bastarache (Deputy Assistant Secretary for Public Housing and Voucher Programs)
- Felicia Gaither (Deputy Assistant Secretary for Field Operations)
- Ashley Sheriff (Acting Deputy Assistant Secretary for Real Estate Assessment Center)
- Tara Radosevich (Management and Occupancy Division, OPHVP)
Goal Strategies

• **Customer Experience-Focused:** Increase community awareness of lead and other health and safety hazards in homes to increase participation in HUD and stakeholder programs and services.

• Align and enforce HUD-assisted housing inspections and mitigation measures to consistently address lead-based paint hazards across HUD-assisted housing programs.

• Advance the Federal research agenda on the effects, evaluations, and control of lead and other health and safety hazards in housing and the impacts on resident health.

• **Equity-Focused:** Continue to prioritize comprehensive reductions in Americans’ exposure to lead in their homes by addressing lead contamination in soil, water, and paint.

• Minimize residential radon exposure.

• Update HUD’s environmental review policies.
  - Sub-strategy: Enhance the Tribal Directory Assessment Tool (TDAT) to establish a central information system for engaging tribes on infrastructure projects covered under FAST-41.
  - Sub-strategy: Update HUD’s National Environmental Policy Act (NEPA) environmental review policies.

• Design and deliver targeted lead and healthy homes programs through improvements in data quality and access.

• Leverage HUD’s relationships with stakeholders across public and private sectors to maximize the impact of every dollar invested in lead, health, and safety activities.
Units Made Healthy, Physically Safe, and Lead-Safe with HUD Dollars, FY 2010-21 (incremental)
Increase community awareness of lead and other health and safety hazards in homes to increase participation in HUD and stakeholder programs and services.

### Milestone Summary

<table>
<thead>
<tr>
<th>Key Milestone</th>
<th>Milestone Due Date</th>
<th>Milestone Status</th>
<th>Owner</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employ a human-centered design and framework on lead and other health and</td>
<td>9/30/2022</td>
<td>On track</td>
<td>OLHCHH</td>
<td>The FY21 Community Compass grantees, who will develop curricula and deliver training, have been selected.</td>
</tr>
</tbody>
</table>
Align and enforce HUD-assisted housing inspections and mitigation measures to consistently address lead-based paint hazards across HUD-assisted housing programs.

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<tbody>
<tr>
<td>Propose a revised Lead Safe Housing Rule pertaining to elevated blood lead level requirements.</td>
<td>12/31/2022</td>
<td>On track</td>
<td>OLHCHH</td>
<td>HUD is coordinating internally and with CDC.</td>
</tr>
</tbody>
</table>

Advance the research agenda on the effects, evaluations, and control of lead and other health and safety hazards in housing and the impacts on resident health.

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<tr>
<td>Develop with CDC and other agencies a research agenda on a variety of housing-related health and safety programs and interventions.</td>
<td>3/31/2023</td>
<td>On track</td>
<td>OLHCHH</td>
<td>HUD is coordinating internally and with the National Institute for Occupational Safety and Health (NIOSH) and EPA on the research agenda.</td>
</tr>
</tbody>
</table>
Continue to prioritize comprehensive reductions in Americans’ exposure to lead in their homes by addressing lead contamination in soil, water, and paint.

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<tr>
<td>Implement Justice40 Pilot in Lead Hazard Control and Healthy Homes Grants.</td>
<td>12/31/2022</td>
<td>On track</td>
<td>OLHCHH</td>
<td>HUD advances environmental justice goals by incentivizing applicants to direct funding to disadvantaged communities through its scoring structure in the lead hazard control and healthy homes grant applications. HUD will provide information on the implementation of lead hazard control and healthy homes grants in disadvantaged communities.</td>
</tr>
<tr>
<td>Update the soil-lead hazard action level for the Office of Lead Hazard Control</td>
<td>6/30/2023</td>
<td>On track</td>
<td>OLHCHH</td>
<td>HUD is collaborating with EPA to assess the data sources needed to update the soil-lead hazard action level.</td>
</tr>
<tr>
<td>and Healthy Homes by working with the US Environmental Protection Agency (EPA)</td>
<td></td>
<td></td>
<td></td>
<td>to identify a lower, more protective “action level” than the current standard.</td>
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### Key Milestones

Minimize residential radon exposure.

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<tr>
<td>Publish Radon Testing and Mitigation in Public Housing (RTMPH) grant notice of funding opportunity (NOFO).</td>
<td>1/31/2022</td>
<td>Complete</td>
<td>OLHCHH</td>
<td>The NOFO was posted on 1/25/2022.</td>
</tr>
<tr>
<td>Develop and implement a Departmental policy clarifying current regulatory minimum requirements for radon.</td>
<td>9/30/2022 5/31/2022</td>
<td>Delayed</td>
<td>CPD-OEE</td>
<td>The target date for this milestone has been changed from 5/31/22 to 9/30/22. Work to finalize internal reviews of existing regulations continues.</td>
</tr>
<tr>
<td>Award RTMPH grants.</td>
<td>6/30/2022</td>
<td>Complete</td>
<td>OLHCHH</td>
<td>The nine grants to PHAs were awarded on 6/17/2022.</td>
</tr>
<tr>
<td>Develop or enhance program-specific radon policies for assisted multifamily property owners and PHAs.</td>
<td>3/31/2023 12/31/2022</td>
<td>Delayed</td>
<td>PIH, CPD, MF</td>
<td>The due date for this milestone has changed from 12/31/22 to 3/31/23. Clearance of the Departmental radon policy is taking longer than expected. Program-specific policies will be based on the Departmental policy, so work on this item will be delayed.</td>
</tr>
<tr>
<td>Deliver updated radon training and guidance materials to HUD customers covering topics including radon basics, regulatory requirements, and testing and mitigation best practices.</td>
<td>9/30/2023</td>
<td>On track</td>
<td>OLHCHH</td>
<td>FY21 Community Compass grantees have been selected. The grantees will develop curricula and deliver radon training.</td>
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</table>
Update HUD’s environmental review policies.

## Key Milestones

### Milestone Summary

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<tr>
<td>Develop a synchronizing tool to import and reconcile Bureau of Indian Affairs (BIA) and National Park Service (NPS) Tribal contact data into the Tribal Directory Assessment Tool (TDAT).</td>
<td>4/30/2023  9/30/2022</td>
<td>Delayed</td>
<td>OEE</td>
<td>The target date for this milestone has changed from 9/30/22 to 4/30/23. HUD is coordinating with Department of Interior agencies on the process for synchronizing BIA and NPS data into TDAT. The TDAT contract action was awarded on 7/6/2022, with completion scheduled for 4/30/2023; the kick-off meeting was held 7/13/2022.</td>
</tr>
<tr>
<td>Develop TDAT Geographic Information Systems tool with comprehensive and user-friendly mapping features.</td>
<td>9/30/2023</td>
<td>On track</td>
<td>OEE</td>
<td>The TDAT GIS tool is being developed.</td>
</tr>
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Update HUD’s environmental review policies.

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<tr>
<td>Develop a framework to mitigate climate- and environmental justice-related hazards and health risks in HUD’s environmental review process.</td>
<td>9/30/2023</td>
<td>On track</td>
<td>CPD-OEE</td>
<td>The framework will be developed based on the revised the HUD environmental review process.</td>
</tr>
<tr>
<td>Update program guidance on environmental review procedures to include analysis of climate mitigation measures, climate adaptation strategies, and environmental justice.</td>
<td>9/30/2023</td>
<td>On track</td>
<td>CPD-OEE</td>
<td>Program guidance will be developed based on the revised HUD environmental review process.</td>
</tr>
<tr>
<td>Develop an environmental review training series for HUD customers</td>
<td>9/30/2023</td>
<td>On track</td>
<td>CPD-OEE</td>
<td>The training series will be developed based on the revised HUD environmental review process.</td>
</tr>
<tr>
<td>Update HUD’s online environmental review tools to reflect updated policy</td>
<td>9/30/2023</td>
<td>On track</td>
<td>CPD-OEE</td>
<td>Tools are pending the finalization of policy.</td>
</tr>
<tr>
<td>Develop a plan to improve environmental review compliance across HUD programs through improved guidance, technical support, and monitoring.</td>
<td>9/30/2023</td>
<td>On track</td>
<td>CPD-OEE</td>
<td>The compliance improvement plan will be developed based on the revised HUD environmental review process.</td>
</tr>
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</table>
Leverage HUD’s relationships with stakeholders across public and private sectors to maximize the impact of every dollar invested in lead, health, and safety activities.

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<tr>
<td>Publish FY22 Lead Hazard Reduction NOFO.</td>
<td>6/30/2022</td>
<td>Complete</td>
<td>OLHCHH</td>
<td>The FY22 LHR NOFO was published on 6/17/2022.</td>
</tr>
<tr>
<td>Award FY22 Lead Hazard Reduction grants.</td>
<td>9/30/2022</td>
<td>On track</td>
<td>OLHCHH</td>
<td>FY22 LHR applications received by 8/8/2022 will be reviewed based on the NOFO.</td>
</tr>
</tbody>
</table>
Design and deliver targeted lead and healthy homes programs through improvements in data quality and access.

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<tr>
<td>Promote, in collaboration with the US Department of Health and Human Services (HHS), data-sharing agreements between state or local health departments and public housing authorities for early identification of assisted property addresses with children with Blood Lead Level &gt;=5 micrograms of lead per deciliter of blood (&gt;=5 mcg/dL).</td>
<td>9/30/2022</td>
<td>On track</td>
<td>OLHCHH</td>
<td>HUD is discussing pilot data-sharing agreements, regarding assisted properties where children with elevated blood lead levels reside, with HHS and states.</td>
</tr>
</tbody>
</table>
Narrative – FY 22 Q3

Work in FY 2022 Q3 on this Agency Priority Goal is on track. The work was primarily developmental, with activities occurring under all eight strategies to formulate their respective action plans and, in many cases, begin implementation. Two additional milestone actions were completed. Grantees continued to make homes of low-income families lead-safe and healthy by using prior year funds within HUD program office accounts. Grantee efforts were especially effective in ways that benefited young children; performing at a rate 4% above that expected for the programs in aggregate. Outreach efforts will be undertaken to help enhance this pattern of performance.

Three milestone actions were completed, 14 actions were on-track, and three were delayed.
- The milestone to publish the radon grant NOFO was completed on 1/25/2022.
- The milestone to award the radon grants was completed on 6/17/2022, ahead of the target date.
- The milestone to develop and implement a Departmental radon policy is undergoing internal HUD review. Tribal consultation is being planned.
- The milestone to develop or enhance program-specific radon policies is delayed, pending issuance of the Departmental radon policy.
- Delays related to the milestone to develop a synchronizing tool to import and reconcile Bureau of Indian Affairs and National Park Service Tribal contact data into the Tribal Directory Assessment Tool have been resolved. The contract has been awarded. Work has begun, albeit with a new, later milestone due date.
### Data Accuracy & Reliability

- **Number of at-risk housing units made healthy, physically safe, and lead-safe each year**

  The number of housing units made healthy and lead-safe through HUD’s Lead Hazard Control Grants, Healthy Homes Grants, Lead Disclosure Rule Enforcement, and Lead Safe Housing Rule Enforcement.

<table>
<thead>
<tr>
<th>Sub-Metric: Lead Hazard Control Grants</th>
<th>Description: Number of housing units made healthy and lead-safe through HUD’s Lead Hazard Control Grants.</th>
<th>Data Source: Grantee reports to Healthy Homes Grant Management System</th>
<th>Dimension &amp; Unit of Measurement: Count: Housing Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Calculation Method: Total of units from each grantee</td>
<td>Frequency: Quarterly</td>
<td>Data Quality: Units are counted only after payment has been made after lead hazard control work has been done and the units have been cleared for re-occupancy, so grantees have a fiduciary responsibility to report accurately; but some grantees report on a single unit more than once, as they make partial and then final payments.</td>
<td>Validation and Verification: Reports are validated against financial payments (LOCCS reporting) and verified by remote and on-site monitoring by grant Government Technical Representatives. Having software checks for duplicate counting of units would improve the measure.</td>
</tr>
</tbody>
</table>

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<tr>
<th>Sub-Metric: Healthy Homes Grants</th>
<th>Description: Number of housing units made healthy and lead-safe through HUD’s Healthy Homes Grants.</th>
<th>Data Source: Grantee reports to Healthy Homes Grant Management System</th>
<th>Dimension &amp; Unit of Measurement: Count: Housing Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Calculation Method: Total of units from each grantee</td>
<td>Frequency: Quarterly</td>
<td>Data Quality: Units are counted only after payment has been made after hazard control work has been done and re-occupancy has been allowed, so grantees have a fiduciary responsibility to report accurately; but some grantees report on a single unit more than once, as they make partial and then final payments.</td>
<td>Validation and Verification: Reports are validated against financial payments (Line of Credit Control System reporting) and verified by remote and on-site monitoring by grant Government Technical Representatives. Having software checks for duplicate counting of units would improve the measure.</td>
</tr>
</tbody>
</table>
### Number of at-risk housing units made healthy, physically safe, and lead-safe each year

The number of housing units made healthy and lead-safe through HUD’s Lead Hazard Control Grants, Healthy Homes Grants, Lead Disclosure Rule Enforcement, and Lead Safe Housing Rule Enforcement.

#### Sub-Metric: Lead Hazard Enforcement

**Description:**
Number of housing units made healthy and lead-safe through HUD’s Lead Disclosure Rule Enforcement.

**Data Source:**
Property owner/property manager reports

**Dimension & Unit of Measurement:**
Count: Housing Units

**Calculation Method:**
Total of units from each owner/manager

**Frequency:**
Quarterly

**Data Quality:**
Units are counted only after the owners/managers have documented completing work and the units have been tested to confirm low lead levels that would allow re-occupancy, so owners/managers face economic and/or court sanctions for not reporting accurately; but limitations on HUD staffing and travel funding preclude on-site quality control checking.

**Validation and Verification:**
Lead hazard control work is validated by consistency checks on records from owners and managers. They are then verified by EPA- or State-certified lead risk assessors. The measure could be improved with routine on-site quality control checking by HUD lead program enforcement and/or its lead enforcement partners.

#### Sub-Metric: Lead Safe Housing Rule Enforcement - HOME-CDBG-HOPWA

**Description:**
Housing units made lead safe through work under HUD’s Lead Safe Housing Rule.

**Data Source:**
Reporting by funding recipients as tracked by the Integrated Disbursement and Information System (IDIS)

**Dimension & Unit of Measurement:**
Count: Housing Units

**Calculation Method:**
Total of units from each funding recipient

**Frequency:**
Quarterly

**Data Quality:**
Units are counted only after payment has been made for completing work and allowing re-occupancy, so funding recipients have a fiduciary responsibility to report accurately; addresses of housing properties where work is not always provided or complete; routine on-site quality control checking for lead results by HUD lead program enforcement and/or its lead enforcement partners is not conducted.

**Validation and Verification:**
Reports are validated against financial payments (LOCCS reporting) and verified by remote and on-site monitoring by CPD representatives. Measure would be improved by routine on-site quality control checking for lead results by HUD lead program enforcement and/or its lead enforcement partners.
Contributing Programs
N/A. Please see slide 4 for a listing of all contributing programs.

Stakeholder / Congressional Consultations
N/A