

**CITY OF ALEXANDRIA,
LOUISIANA**
LEAD-SAFE HOUSING PROGRAM
Safe & Affordable Homes for Healthy Families



**Lead-Based Paint
Hazard Reduction Program**

REVISED March 2023

HUD Lead-Based Paint Hazard Control Grant Program
GrantNumber: LAHLHB0760-20



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City of Alexandria Lead-Safe Housing Program *Policy and Procedures*

Introduction

The City of Alexandria (Rapides Parish, Louisiana) has initiated a comprehensive, lead hazard reduction grant program called the Lead-Free Housing Program. Awarded in 2020 from the U.S. Department of Housing and Urban Development (HUD), Office of Lead Hazard Control and Healthy Homes (OLHCHH), this program is designed to maximize identification and control of lead-based paint hazards in eligible homes. The main focus of the initiative is to create healthy living conditions for children under six through a system of partnerships that optimizes both cost effectiveness and successful lead hazard control. The Lead-Safe Housing Program's Policies and Procedures is designed to summarize the approach to direct the process of lead grant jobs. The City of Alexandria, as authorized by the rules and regulations governing the proper administration of the Lead Safe Housing Program, must adopt policies and procedures as outlined in this document, to the degree practical, for adequate and consistent implementation guidelines that conform to local, state and federal law. This program was approved by City Council Ordinance #37-2021 amending operating budget for the lead abatement grant and other matters with respect thereto. Minor revisions to the plan, as well as increases in the amount of annual award, may be made as needed, without adoption by City Council, as long as the overall premise of the program guidelines remains consistent. Lead Grant jobs with multi-funding sources must be in compliance with all applicable program procedures and guidelines.

Management Plan

Alexandria is committed to eliminating childhood lead poisoning as a major public health problem and to responding to other housing-related health hazards. Our goal is to complete and clear 125 units of lead based paint hazards. Our estimated average quarterly goal, with the exception of the first three quarters, will be 17 completed and cleared units. We also will conduct at least 10 lead outreach efforts and healthy homes events and will provide skilled training to 10 people. We have developed a strong strategy and built a high- quality, cost-effective work plan based on our prior experience and we are fully ready to implement that plan to achieve our goals. The Lead Safe Housing Program falls under the organizational leadership of the City of Alexandria Community Development Department (CmDv), which coordinates and oversees the consortium of program partners. CmDv's Administrator is responsible for coordinating all program components and staff both inside and outside the Department. In addition, CmDv will be directly responsible for carrying out and/ or supervising the housing component of the program, including all environmental assessments, lead remediation activities, healthy homes assessments, contractor bid processes, and follow-up monitoring and maintenance. The City of Alexandria and its partners have qualified personnel in place with significant experience in lead-based paint evaluation, lead hazard control intervention, healthy homes hazard identification, and other aspects of program implementation.

Staff

Alexandria's LBPHC program will be administered by the Community Development Department.

Authorizing Official- Shirley Branham, CmDv Administrator, is responsible for general oversight of the Lead team for the Lead-Safe Housing Program, as well as CDBG, CDBG-CV and HOME funded programs. This position shall also act as the Approving Official to review, request and approve drawdowns in HUD LOCCS, as needed. This position's salary and fringe are not reimbursed by the Lead Grant.

Grants Manager- Shelly Gotreaux has replaced Shirley Branham as Grants Manager and is responsible for the daily management, oversight, goals and overall budget of the Lead-Safe Housing Program staff. This position shall also act as the Approving Official to review, request and approve drawdowns in HUD LOCCS. Eighty percent (80%) of this position's salary and fringe is reimbursed by the Lead Grant. Shelly Gotreaux has completed her certification and training for Lead-Based Inspector, Risk Assessor and Supervisor.

Program Manager/Rehab Specialist – Candice Saucier - Will assist with scope of work development, verification of clients and applications, completing the contracting bidding process and on-site contractor/project oversight. Will work to provide training and education to occupants, public and City officials. One hundred percent (100%) of this position's salary and fringe is reimbursed by the Lead Grant.

Permit Tech/Outreach Coordinator – Vacant – responsible for processing applications, program marketing, data collection, data entry, procurement preparations, scheduling for occupants and inspections, processing lead testing reports and file maintenance. One hundred percent (100%) of this position's salary and fringe is reimbursed by the Lead Grant.

Inspector/Risk Assessor – Nicholas Mabrey has replaced Keith Gremillion and will be responsible for project scopes of work, cost estimates, Contractor and construction oversight, pre-construction conferences, Contractor payment requests and preparation of HUD LOCCS drawdowns. One hundred percent (100%) of this position's salary and fringe is reimbursed by the Lead Grant. Nicholas has completed his training and certification for Inspector, Risk Assessor and Supervisor. This position will be assigned a vehicle specific to use for the Lead-Safe Housing Program; however, all Lead staff shall be authorized to use as needed.

Financial Accounts Manager/Procurement Officer – Vacant, will be responsible for requesting PO's, processing invoices, collecting signed contracts, financial management, procurement compliance, and preparation of HUD LOCCS drawdowns. Eighty percent (80%) of this position's salary and fringe is reimbursed by the Lead Grant. Training and certification is required.

Key Personnel	Title / Role	% Time FTE	Duties / Responsibilities
Shirley Branham	CmDv Administrator	0% FTE	general oversight of the Lead team for the <i>Lead-Safe Housing Program</i> , as well as CDBG, CDBG-CV and HOME funded programs. This position shall also act as the

			Approving Official to review, request and approve drawdowns in HUD LOCCS, as needed.
Shelly Gotreaux	Grants Manager	80% FTE	daily management, oversight, goals and overall budget of the Lead-Safe Housing Program staff. This position shall also act as the Approving Official to review, request and approve drawdowns in HUD LOCCS.
Candice Saucier	Program Manager / Rehab Specialist	100% FTE	application and award process, contract management, Contractor and Partner oversight, program budget, database management, as well as HUD reporting and grant coordination.
Vacant	Permit Tech / Outreach Coordinator	100% FTE	processing applications, program marketing, data collection, data entry, procurement preparations, scheduling for occupants and inspections, processing lead testing reports and file maintenance.
Nicholas Mabrey	Inspector / Risk Assessor	100% FTE	project scopes of work, cost estimates, Contractor and construction oversight, pre-construction conferences, Contractor payment requests and preparation of HUD LOCCS drawdowns.
Vacant	Financial Accounts Manager / Procurement Officer	80% FTE	requesting PO's, processing invoices, collecting signed contracts, financial management, procurement compliance, and preparation of HUD LOCCS drawdowns.

Selection Process for Services and Contractors

The Lead -Safe Housing Program will adhere to the City of Alexandria's procurement process and will comply with 2CFR 200.

Contractors:

The City utilizes private contractors to complete the work as described in the work write up prepared by the Inspector/Risk Assessor. We accept applications from licensed contractors throughout the year to participate in our program. We bid all of our projects to our approved contractor pool.

Community Based Organizations:

The City will directly provide to the community educational information, referrals, outreach and program evaluation.

Laboratory Services:

The City contracts for environmental testing services including but not limited to: Lead, Asbestos, Air Quality and Radon through a request for proposals process which includes MWBE and Section 3 consideration. These contractors will be selected through a request for proposal (RFP) process.

Training Services:

The City contracts for training services in the areas of Lead Abatement Supervisor, Lead Safe Worker, and Renovate, Repair and Painting (RRP). These contractors will be selected through a request for proposals (RFP) process.

Monitoring Plan

The program manager will be responsible for monitoring non-construction contractors. A monitoring review will take place at least once a year or on an as needed basis. The monitoring review will be guided by the monitoring review checklist.

Funding and Financing Mechanism

As the applicant for Lead Based Paint Hazard Control funding from HUD, the City of Alexandria will be the fiscal agent *administering grants* to qualified homeowners/tenants and will contract for services, monitor project performance and report quarterly on that performance. Sub-grantees/contractors are reimbursed by the City for services performed and the City will submit regular LOCCS drawdown requests for reimbursement of program expenditures.

Cost Per Unit:

The average HUD lead grant subsidy including Community Development Block Grant (CDBG) match amounts per unit will be \$14,000 with a maximum grant of \$20,000 for one to three unit structures. The maximum award for stand-alone structures with two (2) or more units shall be allowed to spend varying amounts on any of the units. Any amount over \$20,000 per structure paid using lead grant funding will be approved by our GTR.

Ineligible Unit Selection:

A structure will be determined ineligible to participate in the program if one or more of the following conditions exist:

1. The residence has extensive damage due to termite infestation including infested studs, plates, rafters, and ceiling joists or evidence of mold damage.
2. The residence has major structural defects such as foundation or roofing issues. Examples would be unlevelled piers, rotten floor joists, sagging roof, rafters or ceiling joints, inadequate lower or upper plates allowing settlement to sag to ceiling joists, entry doorways and windows.
3. The residence is located in a flood zone with remediation costs over \$10,000.00

Identification of Properties:

We will focus our marketing efforts on low-mod income/Target areas which contain the highest incidence rates of older housing, unemployment, young families, and health disparities within the City. Households we assist will be low-to-moderate income, per the guidelines set forth from the Office of Lead and Healthy Homes Hazard Control (OLHHHC) and all housing units will have been built prior to 1978. Applications are processed for eligibility on a first-come, first-served basis. Cases involving an EBLL child are moved to the top of the list. Cases with resident or visiting children under six are prioritized over cases without small children. The Lead Safe Housing Program Guidelines provide program eligibility information and general guidelines for the program.

Income:

The low-income limits are established by HUD for Alexandria, Louisiana within Rapides Parish jurisdiction. The applicant’s household gross annual income must be within current income limits for low-income (80% of median) to be eligible for housing assistance. *These limits are subject to periodic changes by HUD to reflect cost of living changes in median income, etc. As income limit changes occur, the Lead Safe Housing Program income limits will automatically be revised to coincide with the new Rapides Parish (Louisiana) HOME low (80%) income limits, which are usually effective annually in the spring.* The formula uses the number of family members in the house with the total amount of income from all defined parties. The current limits, as of June 2022, are as follows:

# of people per household:	1 person	2 person	3 person	4 person	5 person	6 person	7 person	8 person
80 % Median Income:	\$35,750	\$40,850	\$45,950	\$51,050	\$55,150	\$59,250	\$63,350	\$67,400

Annual income is defined as “all amounts, monetary or not, which go to, or on behalf of, the ... {household} head or spouse (even if temporarily absent) or to any other... {household} member... anticipated to be received... during the 12-month period following” the determination of income. Gross annual income includes but is not limited to child support, social security, pensions, income from annuities, interest income, etc. All income verification documents must be dated within six (6) months of application.

The calculation used to determine gross annual household income shall be consistent with HUD regulations and HUD’s definition of income including the sources of income that are to be included or excluded from the calculation. Income of all household residents age 18 or over, unless they are a full-time student are to be included. Income determinations will be based on not less than two months of source documentation (e.g. pay stub, bank statements, etc.) and will generally be supplemented with third-party verifications including, but not limited to:

1. *Employment* – a “Verification of Employment” will be completed and signed by the employer for each employed member of the family and returned to CmDv.
2. *Public Assistance* – a “Verification of Income Form” signed by the agency or entity providing the assistance (e.g. social security, SSI, etc.) must be provided by the Owner to CmDv.

3. *Self-Employment and/or Working Income* – applicants will be required to submit the previous year’s Federal Income Tax Return (IRS 1040 or 1040A) as evidence of income, as well as year-to-date profit and loss statements.

Income Definitions:

As set forth in HUD’s Income Verification Guidance, 2017-05 issued December 13, 2017 the “annual income” will be defined as found in 24 CFR 5.609, and is referred to as “Part 5 annual income”. This definition is similar (one of three options) to that used by the Housing Choice Voucher, Community Development Block Grants (CDBG), HOME Investment Partnerships Program (HOME) and many other HUD programs.

The term “annual income” is used to refer to annual (gross) income using one of the following definitions of “annual income” when calculating income and allowances for grant program assistance.

1. Annual Income as defined in 24 CFR 5.609, referred to as “Part 5 annual income”
2. Annual income as reported under the Census Long Form for the most recent decennial census and
3. Adjusted gross income as defined for reporting purposes under the IRS Form 1040 long form (not IRS Forms 1040A or 1040 EZ themselves that were submitted to IRS)

The City of Alexandria has chosen to verify income with Item 1 referenced above: *Part 5 annual income*.

All earned and unearned income of all household members (head of household, spouse, co-head, and any other adult members of the household over 18 years of age) shall be disclosed on the application. All assets held by all household members shall be disclosed on the application. Applicants must disclose their ownership relationship to the proposed assisted property as well as any other non-occupant owners or other investment owners with an interest in the proposed assisted property.

An income verification is good for six months from the time of the verification. If more than six months’ lapse, the household income will be re-verified. Once the applicant is determined to be income qualified, the owner-occupant or rental tenant income certification form and income certification questionnaire to include all supporting documents must be forwarded to the City for review and approval. Documents requested include benefit award letters, example: Social Security, retirement and check stubs. If applicant is paid weekly, then City requests at least 4 stubs, if paid bi-weekly then applicant is to provide 2 stubs showing a full month pay received. If check stubs are not available, an income verification form will be submitted to the applicant’s employer for verification of hourly wage and estimated annual income.

Income Verification:

A worksheet for verifying the current rate of annual income at the time of assistance (within 6 months) will be completed for each client. Application Enrollment, eligibility determinations, record

keeping and related matters are described in detail in the Policies and Procedures. The following income verification document review hierarchy will be followed in all cases:

1. Third Party (online or hard copy)
2. Verbal Third Party (documented by the grantee)
3. Tenant/Landlord Declaration (signed statement by tenant and/or landlord)
4. Form HUD 50058 or income eligibility letter from the PHA/Housing Choice Voucher administrator or the CPD Income Eligibility Calculator through HUD Exchange to certify annual income summary
5. Bank Statement/Pay Stubs to confirm consistency. If bank statements reflect cash deposits on more than two months, then the cash deposits will be averaged and multiplied by 12 months to establish cash assets as income.
6. Applicants claiming “no income” will be required to complete an Affidavit of Zero Income Verification. The verification will be reviewed every six months.

Initial Screening:

Interested individuals can directly contact the City of Alexandria if interested in the Lead-Safe Housing Program. Additionally, we can receive referrals from community organizations and agencies such as: Alexandria Housing Coalition, Rapides Parish Health Department, and City of Alexandria Code Compliance. Referrals are forwarded to City of Alexandria Community Development Department (CmDV) via phone, mail, in person and/ or e-mail. The Lead-Safe Housing Program will comply as set forth in HUD’s guidelines 2014-01 Eligibility of Units for Assistance as follows:

Recipients of federal funds issued under OLHCHH lead hazard control grant programs (i.e., the Lead-based Paint Hazard Control and Lead Hazard Reduction Demonstration grant programs), and authorized by the Residential Lead-Based Paint Hazard Reduction Act (Title X), as amended, which establishes the criteria for which assistance can be provided for housing containing lead-based paint hazards.

Section 1011(a) of Title X reads:

(1) for grants made to assist rental housing, at least 50 percent of the units must be occupied by or made available to families with incomes at or below 50 percent of the area median income level and the remaining units shall be occupied or made available to families with incomes at or below 80 percent of the area median income level, and in all cases the landlord shall give priority in renting units assisted under this section, for not less than 3 years following the completion of lead abatement activities, to families with a child under the age of six years, except that buildings with five or more units may have 20 percent of the units occupied by families with incomes above 80 percent of area median income level

(2) for grants made to assist housing owned by owner-occupants, all units assisted with grants under this section shall be the principal residence of families with income at or below 80 percent of the area median income level, and not less than 90 percent of the units assisted with grants under this section shall be occupied by a child under the age of six years or shall be units where a child under the age of six years spends a significant amount

of time visiting.

Summary Table of Section 1011

Occupant Type	Income Level	Child Occupant <6 years old
Renter	<ol style="list-style-type: none"> 1. At least 50% units must be less than 50% AMI, and 2. Remaining units (<50%) must be less than 80% AMI 	<ol style="list-style-type: none"> 1. Not required at time of assistance 2. Property owner must give priority to families with child under 6 years old for at least 3 years
Multifamily Renter (≥5 units in same property)	<ol style="list-style-type: none"> 1. 20% of total number of units in same building may exceed 80% AMI 2. Remaining units must meet renter income requirements above 	<ol style="list-style-type: none"> 1. Not required at time of Assistance 2. Property owner must give priority to families with child under 6 years old for at least 3 years
Owner (primary residence)	100% of owner-occupied units must be occupied by families with less than 80% AMI	<ol style="list-style-type: none"> 1. At least 90% of total number of owner-occupied units assisted must have: <ul style="list-style-type: none"> -A child under 6 years old in residence, or -A child under 6 years old spends a "significant amount of time or -A pregnant woman 2. Less than 10% of total number of units assisted may be occupied by families without a child

Use of Funds in Multifamily (≥ 5 Units) Housing

In some cases, landlords and/or property owners should be expected to contribute significantly towards the cost to remediate hazards in their properties, especially those owning large housing complexes, thus ensuring that they demonstrate their responsibility to provide safe and healthy housing for their tenants. The level of contribution should be determined on a case-by-case basis at the discretion of the grantee. A child is not required to be in occupation within a multifamily unit in order to provide lead hazard control assistance, but the owner/landlord must agree to give priority to families with children under six for not less than three years following the completion of work.

Vacant Rental Units

The OLHCHH permits lead hazard control work in vacant units provided the landlord owner/landlord must agree to give priority to families with children under six for not less than three years following the completion of work. While remediating lead-based paint hazards in vacant units is permissible, grantees must ensure that they are not forgoing units where children are currently residing in preference of vacant units.

Renter Occupied Units without Children

The OLHCHH recognizes that the intention of Title X is to implement primary prevention strategies that address homes where at-risk children are likely to reside, with a focus on homes where children under six years of age currently reside. Therefore, per Section 1011(a)(1), the OLHCHH permits grantees to assist income-eligible rental units where children under six are not currently in residence, provided that the landlord gives priority in renting units assisted, for not less than three years from the date of the completion (i.e., clearance of lead hazards) of lead hazard abatement activities, to families with a child under the age of six years. The OLHCHH considers a pregnant woman as a qualifying “child occupant,” although the presence of a qualifying child at the time of assistance is not required in rental housing.

Giving Priority to Families with Children Under Six

For not less than 3 years following the completion of lead abatement activities.” A requirement applies to all rental housing, whether occupied or not at the time of assistance, and for not less than three years following the date of assistance; it does not apply to owner-occupied housing. Policies to ensure assisted units are prioritized for families with children under six years of age, such as, but not limited to:

- Requiring compliance in the terms of your assistance agreement with owners;
- Registering assisted units in a publicly accessible lead-safe housing registry; and/or
- Following up with the owner(s) at least annually and document in the unit file that the owner has attempted to comply.

When determining initial eligibility for the program, staff look at the following:

Year built - To determine year built, staff searches the Rapides Parish Tax Assessor database and to be eligible, housing unit must have been built prior to 1978.

Location - The property must be located within the city limits of Alexandria.

Children under six years of age - not a requirement for rental properties. Only a limited number of homeowner properties can be approved for assistance without having a child under six living in the residence or visiting frequently. The Lead-Safe Housing program is a first come first served program with a three tiered priority system.

-Households (homeowners and rentals) with children under six living in the residence or visiting frequently.

-Rental units including vacant units that do not have a child under six living in the residence or visiting frequently.

- Homeowners who do not have a child under six living in the residence or visiting frequently.

Notes:

- Households with a child with an Elevated Blood Lead Level (EBLL) will never be waitlisted and will be given priority over all other cases.
- Per HUD guidelines, 10% of homeowner units do not have to meet the child criteria and may be considered for lead program assistance.

- Rental units do not have to meet the child occupancy rule.
- Vacant rental units are eligible, but vacant homeowner units are not.
- Owners must reside in the housing unit, must be the primary Owner or the heir of a living trust, and must certify that the structure is the primary residence of the applicant. If at any time during the application process CmDv determines the Owner does not reside in the housing unit to receive repairs, the application will be disqualified.
- Eligible occupancy applicants with physical disabilities may be considered as a priority. Disabled is defined as a person who has a disability to have a physical, mental or emotional impairment that is expected to be of long continued and indefinite duration. This disability must substantially impede his/her ability to live independently, and be of such a nature that such ability could be improved by more suitable housing conditions. A disabled person is also defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act (42 USC 6001(5)).

If the homeowner or landlord is interested in the program and is determined to be potentially eligible based on the above criteria, program staff mails the owner either a homeowner application or rental property and brochure.

Applications

1. Once an application is returned, the homeowner or landlord information is entered into the "Applicants" database.
2. If an application appointment is needed, CmDv staff will assist applicants with completing the application forms and gathering accompanying documents for the Lead-Safe Housing Program.
3. The Permit Technician will review application and accompanying forms and documentation to decide whether applicant is eligible. Eligibility is determined by HUD and program regulations. For homeowners, eligibility is based on age and condition of housing unit; presence of children less than six years of age; and household income not exceeding 80 percent of the area median income adjusted for family size. For landlords, eligibility is based on age and condition of housing unit(s); willingness of landlord to make unit(s) available to families with children under six years of age for three years after lead remediation work (application includes a written statement to be signed by landlord stating this intention); and tenant household income not exceeding 80 percent of the area median income adjusted for family size. For multi-family units, at least fifty percent of program rental units must have tenants with incomes not exceeding 50% of the area median income adjusted for family size, and the remaining rental units must have tenants with incomes not exceeding 80% of the area median income adjusted for family size.
4. If application information and accompanying documentation proves homeowner or landlord ineligible for program assistance, the homeowner or landlord is notified in writing that they are ineligible and the reasons for the determination.
5. If application information and accompanying documentation proves homeowner or landlord eligible for program assistance, the Permit Technician gives the file to the Program Manager

for approval. A letter is sent to the owner giving the property conditional approval and the next steps in the process. Once approved, the Permit Tech or Program Manager requests a lead inspection and risk assessment from one of the testing firms with which the program is under contract. Staff processing applicant files shall complete an Application Checklist.

Waiting List

In the event that more applications are submitted than can be processed, applicant information will be recorded on the waiting list spreadsheet of the "Applicant" database. As unit needs and funding availability permit, applications will be removed from the waiting list and processed in the following order:

- a. Applications for properties where a child has been found to have an Elevated Blood Lead Level (EBLL) will be processed immediately as funding permits.
- b. Homeowner and rental properties with children less than six years of age either living in the home or visiting frequently.
- c. Rental properties without children less than six years of age and vacant rental properties.
- d. Homeowners without children less than six years of age living in the home or visiting frequently.

Recapture Provisions / Lien and Agreement

A lien or similar contract provision will be executed against every multi-family or rental property receiving Home Lead Safe Housing Program grant funds, upon occurrence of any of the following events *during the three-year affordability period*. The entire sum secured by the lien, without interest, shall be due and payable by the property owner upon demand. Repayment may be demanded upon:

- a. Transfer or conveyance of the real estate by deed, land contract, lease, or otherwise, during the Affordability Period;
- b. Commencement of foreclosure proceedings by any mortgagee (or deed in lieu of foreclosure), within the Affordability Period;
- c. Units not being used as a residence by a qualifying tenant or not leased according to the Lead Safe Housing Program Agreement. The award recipient must execute and record a lien and/or contract provision prepared by the City of Alexandria Department of Community Development.

A lien for a Forgivable Mortgage will be executed against every homeowner receiving Home Lead Safe Housing Program grant funds. The homeowner shall comply with the terms of the Forgivable Loan Promissory Note and Mortgage for the term of three (3) years ("Loan Term") beginning on the date of the Forgivable Loan Promissory Note and Forgivable Mortgage. The loan shall be forgiven in the amount of one-third (1/3) on each anniversary of the date the homeowner executed the Forgivable Loan Promissory Note and Forgivable Mortgage for each year during the Loan Term.

The homeowner shall own and occupy the mortgaged property as the homeowner's principal residence. The homeowner shall notify CmDV if the homeowner no longer occupies the mortgaged property as the principal residence or if the homeowner sells or transfers the mortgaged property

during the Loan Term. If the homeowner sells or transfers the mortgaged property during the Loan Term, the homeowner shall pay the un-forgiven balance of the loan, unless the net proceeds of the sale are not sufficient to cover the un-forgiven balance of the loan.

Disputes - Lead Hazard Appeal Process

Any disputes made throughout this process must be made through our appeal process in the following manner:

Applicants must make appeals within 15 days after receipt of a notice of the action that is being appealed. Notices of ineligibility, damage assessment, and award amount will be delivered to the applicant by standard mail with notice of mailing. Once official notice of the program determination is received, the appeal process may begin for the program applicant.

All appeals must be received via e-mail using the standard appeals form and include documentation to support the appeal. Appeals should be sent to cda@cityofalex.com Appeals may be delivered by US Mail to the City of Alexandria Community Development Office via the mailing address below:

Community Development Department
Lead Hazard Appeals
625 Murray Street, Ste 7
Alexandria LA 71301

Appeal Response Team

The appeal response team will address appeals in the order in which they are received. An appeal response team member will log the appeal, review the entire applicant file along with any provided supporting documentation from the applicant, generally within 7 business days. During the review, additional ineligible criteria may be discovered or award amounts may be adjusted in consideration of the supporting documentation or file information.

All appealed files will receive an appeal determination letter (ADL) by standard mail which details the results of the file review. All ADLs will be drafted by the appeal response team then reviewed and approved or denied by the program and executive director. If the applicant wins the appeal, the file will be returned to the program workflow at its current stage and continue through the grant administration process with the updated information reflected in the ADL. A denial of program eligibility will result in the grant application being removed from the program.

Applicants with appeals to the award amount or damage determination will be provided the opportunity to proceed through the grant process with the updated values or voluntarily withdraw from program participation.

All determinations expressed in the ADL are final program determinations and are not eligible for further appeal.

Conflict of Interest
Applicability

- In the procurement of supplies, equipment, construction, and services by recipients, and by subrecipients (including those specified at § 570.204(c)), the conflict of interest provisions in 2 CFR 200 shall apply.
- In all cases not governed by 2 CFR 200 the provisions of this section shall apply. Such cases include the acquisition and disposition of real property and the provision of assistance by the recipient, by its subrecipients, or to individuals, businesses or other private entities under eligible activities which authorize such assistance (e.g., rehabilitation, preservation, and other improvements of private properties or facilities pursuant to § 570.202, or grants, loans and other assistance to businesses, individuals and other private entities pursuant to § 570.203, § 570.204 or § 570.455).

Conflicts prohibited

Except for the use of OLHCHH funds to pay salaries and other related administrative or personnel costs, the general rule is that no persons described in paragraph (c) of this section who exercise or have exercised any functions or responsibilities with respect to OLHCHH activities assisted under this part, or who are in a position to participate in a decision-making process or to gain inside information with regard to such activities, may obtain a financial interest or benefit from a OLHCHH -assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a OLHCHH -assisted activity, or with respect to the proceeds of the OLHCHH -assisted activity, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

Persons Covered

The conflict of interest provisions of paragraph (b) of this section apply to any person who is an employee, agent, consultant, officer, or elected official or appointed official of the recipient, or of any designated public agencies, or subrecipients which are receiving funds under this part.

- Exceptions: threshold requirements. Upon the written request of the recipient, HUD may grant an exception to the provisions of paragraph (b) of this section on a case-by-case basis when it determines that such an exception will serve to further the purposes of the Act and the effective and efficient administration of the recipient's program or project. An exception may be considered only after the recipient has provided the following:
 - A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and
 - An opinion of the recipient's attorney that the interest for which the exception is sought would not violate State or local law.

Factors to be considered for exceptions. In determining whether to grant a requested exception after the recipient has satisfactorily met the requirements of paragraph (d) of this section, HUD shall consider the cumulative effect of the following factors, where applicable:

Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project which would otherwise not be available;

Whether an opportunity was provided for open competitive bidding or negotiation;

Whether the person affected is a member of a group or class of low- or moderate-income persons intended to be the beneficiaries of the assisted activity, and the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class;

Whether the affected person has withdrawn from his or her functions or responsibilities, or the decision-making process with respect to the specific assisted activity in question;

Whether the interest or benefit was present before the affected person was in a position as described in paragraph (b) of this section;

Whether undue hardship will result either to the recipient or the person affected when weighed against the public interest served by avoiding the prohibited conflict; and any other relevant considerations.

Environmental and Historic Reviews

1. Environmental Review and Historic Review Section 106 (Part 1) are requested once eligibility is determined. Once project sites are identified within the target area and before funds are committed or spent, a Tier 2 will be completed for each site. It will identify the environmental compliance factors that must be addressed once specific residential units have been identified for remediation work. (i.e., historic preservation, airport clear zones, noise abatement) This review will be made available through the HUD Environment Review Online System (HEROS).
2. An Environmental Review request is made by the Permit Technician to the Environmental Review Specialist. If the housing unit is located in a flood plain, insurance must be obtained before work begins.
 - a. A Historic Review Section 106 (Part 1) request is made by the Permit Technician to the staff Historic Preservationist.
 - b. If the property is determined to have historic designation or elements, the Historic Preservationist will note on the form what accommodations must be made to retain the necessary historic elements.
 - c. If the property is historic, a Historic Review Section 106 (Part 2) will be completed by the Historic Preservationist once the initial scope of work is completed by the construction specialist. The Historic Preservationist will determine if any corrections must be made to the scope of work and sign off on the final scope of work when all elements are satisfied
 - d. If necessary, the Historic Preservationist will get additional approvals from the State of Louisiana's Historic Office and local historic districts.

Lead Inspections/ Risk Assessments

A. Assessments

As set forth in HUD's guidelines for the evaluation and control of lead-based paint hazards in housing, 2013-01 issued April 22, 2017, Lead-Based Paint Inspections and Risk Assessments for Lead-Based Paint and Lead-Based Hazards will be conducted in accordance with HUD, EPA and State regulations and guidelines. CmDv will utilize site-

specific lead inspection/risk assessments to determine the nature and scope of the lead hazards and the types of lead hazard controls needed (lead cleanings, interim controls and/or abatement techniques).

OHHLHC grant funds conducting lead evaluation activities will comply with the following requirements:

1. Determine the lead-based paint classification of all surfaces by properly categorizing and testing each “testing combination” in each room equivalent in accordance with Chapter 7 of the HUD Guidelines. A testing combination is a unique combination of room equivalent, building component type, and substrate.
 - a. All lead-based paint inspections and risk assessment reports must be conducted and documented in accordance with Chapter 5 and 7 of the HUD Guidelines.
 - b. All lead-based paint inspections, risk assessments and hazard control work must be completed by firms certified for, and persons trained and certified for, the specific work conducted.
 - c. Consistent with the Guidelines, every room equivalent must be identified in the property sketch and every building component must be represented in the sampling scheme (identified in the XRF test result report) used to test a property.
 - d. Conduct a complete and full lead-paint inspection and risk assessment for each unit assisted with lead grant funds. Partial or limited lead-based paint inspections and risk assessments are not acceptable for OHHLHC grant programs and will not be reimbursed by HUD.
 - e. Composite sampling for the risk assessment and clearance of lead hazards is not authorized under OHHLHC grant programs.

2. Windows are costly and therefore require clear justification when being replaced.
 - a. Testing of only a single window (or even a few windows) as representing a testing combination for the entire property (interior and exterior) is not allowable, even if all the windows are of identical construction and painting history. (This practice does not comply with the HUD Guidelines’ instructions in Chapter 7 for performing inspections.)
 - b. If the LIRA requires that more than five (5) windows be replaced in a property with the cost charged to OHHLHC grant funds, you must document each window being replaced with either a) XRF readings from each window or b) a photo of each window, and must include these in the risk assessment report.
 - c. Failure to clearly and accurately document the need to replace windows under this policy guidance will result in the disallowance of associated expenses.
 - d. Windows replaced with lead grant funds must contain lead-based paint hazards not merely lead-based paint. You may not expend grant funds to address intact lead based paint. This distinction is critical and must be clearly outlined in the LIRA.
 - e. As always, if the window replacement is to be conducted using funds other than OHHLHC grant funds, the documentation requirements for justification of the use of the other funding source (e.g., Community Development Block Grant or weatherization funds) must be met.

3. Allowable lead-based paint hazard control costs include addressing lead-based paint hazards only. Lead-based paint is any paint, varnish, shellac, or other coating that contains lead equal to or greater than 1.0 mg/cm² as measured by X-ray fluorescence (XRF), or 0.5 percent by weight (5000 µg/g, 5000 ppm, or 5000 mg/kg) as measured by laboratory analysis (although state or local definitions are to be used if they are more stringent). Therefore, lead present in items other than coatings, such as unpainted ceramic tile and porcelain bathtubs, is not lead based paint; therefore, removing or treating such items is outside the scope of the authorizing statute for the lead hazard control grants program, and is not eligible for reimbursement to the OHHLHC grant as a lead hazard control activity.
4. Specifications (scopes of work) for lead hazard control must be established directly from the inspection and risk assessment (reports), and must address all identified lead-based paint hazards in the property. In addition, only those lead-based paint hazards identified and clearly documented in the LIRA report are eligible for reimbursement.
5. If rehabilitation work is combined with lead hazard control, then the two activities MUST be clearly separated in the scope of work and the subsequent bid.
6. LHC grants may cover “minimal rehabilitation” activities when those activities are specifically required to perform effective hazard control, and without which the hazard control could not be completed, maintained, and sustained. Minimal rehabilitation activities MUST be identified and documented in the LIRA.
7. Bids must be based on the scope of work and be awarded competitively according to federal and applicable state/tribal/local procurement requirements.
8. Risk assessments used (along with lead-based paint inspections) as part of scoping the work are valid for no more than 12 months from the date completed. However, the OHHLHC strongly recommends that risk assessments be conducted within six months before the hazard control work because the results are more current and more accurate; this timing also fits with the six-month blood lead level testing period preceding the lead hazard control work, as recommended in the grant programs’ NOFA.
9. Properties whose lead-based paint evaluation report documents (inspection/risk assessment) do not contain the required information per the HUD Guidelines and this policy guidance will not be eligible for reimbursement of evaluation or control activities by OHHLHC grant funds.

The overall goal is to reduce immediate lead hazards, such as lead contaminated dust, lead contaminated bare soil and loose, peeling, or flaking lead-based paint to clearance levels; to slow recontamination by treating bare soil and high risk lead-paint surfaces; to make repairs to prevent paint failure; to facilitate clean-up of recontamination by creating cleanable floors and window troughs; and to educate Property Owners and occupants on lead safety and in-place management of lead hazards, particularly regarding the slowing and cleaning of recontamination.

B. Clearances

As set forth in HUD's guidelines Dust-Lead Action Levels for risk assessment and clearance; clearance of porch and floors, 2017-01 Rev 1 issued February 16, 2017 Lead-Based Paint Inspections and Risk Assessments for Lead-Based Paint and Lead-Based Hazards will be conducted in accordance with HUD, EPA and State regulations and guidelines. Upon completion of the lead remediation process, a state Certified Lead Inspector will perform a visual inspection and clearance test in accordance with HUD requirements and the Louisiana Department of Health and Hospitals regulations.

Effective March 8, 2021, OLHCHH LBPHC and LHRD grantees will use the following dust-lead action levels and clearance action levels (or lower levels if required by local, state or tribal authorities having jurisdiction), where the unit $\mu\text{g}/\text{sf}$ means "micrograms of lead per square foot sampled" (this unit can also be written as $\mu\text{g}/\text{ft}^2$):

New Dust-Lead Action Levels:

Floors: $\geq 10 \mu\text{g}/\text{sf}$

Window Sills: $\geq 100 \mu\text{g}/\text{sf}$

New Lead Clearance Action Levels:

Interior Floors: $< 10 \mu\text{g}/\text{sf}$

Porch Floors: $< 40 \mu\text{g}/\text{sf}$

Window Sills: $< 100 \mu\text{g}/\text{sf}$ W

The Inspector/Risk Assessor and Lead Program Manager/Rehab Specialist will analyze project data and job files to determine if appropriate strategies and funding have been utilized and to make observations and recommendations for improvement to staff.

1. The Permit Tech or Program Manager requests the lead inspection and risk assessment (LIRA) with a contracted inspection firm.
2. The contracted inspection firm performs the necessary inspections and forwards a copy of the reports, along with the invoice, to the Program Manager.
3. The Program Manager will review the reports and will provide a copy of them to the homeowner or landlord within fifteen (15) days of receipt of report.
4. If lead hazards are not found in the unit, the homeowner or landlord will receive a letter along with the LIRA detailing that the unit is not eligible for the lead-safe housing program.
5. If lead hazards are found in the unit, the homeowner or landlord will receive a letter along with the LIRA detailing that the unit is conditionally eligible for the lead-safe housing program. The Program Manager will provide the LIRA to the construction specialist for a work write-up.

Property Inspection

On a scheduled date, the Inspector/Risk Assessor meets with the homeowner/landlord and/or tenant. Along with the LIRA report, the specialist will inspect the property for minimum housing code violations. The inspection process includes:

1. Photographs
2. Exterior measurements and field drawing
3. Physical inspection, with field notes, of all components relative to the exterior structure
4. Site inspection
5. Interior measurements and field drawings
6. Room by room inspection and field notes
7. Attic inspection and field notes
8. Mechanical, electrical and plumbing considerations
9. Crawl space inspection and field notes

Upon completion of the inspection, a debriefing of the inspection is held with the owner and/ or occupant(s). The purpose of this discussion is to go over any critical findings. All questions about the program and the inspection should be answered at this meeting.

Work Write-ups and Cost Estimates

The Inspector/Risk Assessor and/or designated remediation staff shall develop a scope of work utilizing the Lead Inspection and Risk Assessment reports, information gathered by a remediation inspection, and discussion information with property owner and/or tenants. If program funds will be utilized for the job, a separate section with the scope of work and cost estimate will be developed for each funding source (i.e. emergency repair, or healthy homes, handicapped, etc.). An initial meeting and ongoing discussions between remediation staff and the property owner and/or tenants will take place on an as needed basis until the scope of work and cost estimates are completed by the Inspector/Risk Assessor and/or designated remediation staff. Lead grant funds may only be used for lead based paint hazards as identified in the lead inspection / risk assessment report. Other work using various funding sources may only be performed as applicable guidelines for each different program prescribe.

Upon completion of the write-up, the cost estimate is prepared using line item costs that are a part of the Construction Specialist Rehab Handbook. A copy of the priced write- up should be maintained in the file.

Lead Hazard Control Interventions

The Alexandria Lead-Safe Housing Program will implement intervention strategies based on the condition of the units, the immediacy of the hazard, the intent of the intervention and the funds available. The guiding source will be the LIRA report. We will use an approach that is cost effective and will provide the highest possible level of long term lead safety while maximizing funds available. Some strategies to be used:

Interior

1. Repair of defective or rotted painted substrates.
2. Treatment of specific surfaces identified as a source of lead poisoning of a child.
3. Treatment of window wells, jambs and sashes utilizing coil stock inserts or component replacement.
4. Paint stabilization of other interior deteriorated lead painted surfaces.
5. Treatment of door friction and impact surfaces to include component replacement.
6. Treatment of friction and impact surfaces on floors and stairs including adjacent horizontal surfaces that test positive for leaded dust.
7. Treatment of other leaded surfaces.
8. Cleaning of contaminated forced-air heating systems.
9. Cleaning to achieve clearance in accordance with Federal clearance standards.
10. HEPA vacuuming and specific cleaning of all interior horizontal surfaces.
11. Resident education regarding ongoing cleaning

Exterior

1. Treatment of defective or rotted lead painted substrates.
2. Treatment of lead painted exterior surfaces.
3. Soil remediation of accessible lead contaminated soil.
4. Treatment of other lead contaminated building components to include enclosure and replacement.

Review Process

The Inspector/Risk Assessor will give a copy of the scope of work to the Program Manager. The Program Manager will review the scope of work and approve. The Inspector/Risk Assessor calls and requests a time to meet with the homeowner or landlord to review the work write-up. The Inspector/Risk Assessor informs and explains to the owner the method of lead hazard remediation and the level of owner protection and/or relocation issues that have surfaced as a result of the potential work. At this meeting, time should be taken to provide any additional information about the program, to answer questions relative to the recommended scopes of work and to generally make the homeowner or landlord more comfortable about the program. When the scope of work is agreed upon by both parties, the owner will initial each line item of the work write-up and sign a copy of the work write-up.

Prepare to Bid Out Work

Once the scope of work and bid forms are signed by the owner, the file is returned to the Permit Technician for processing. The work file should include:

1. Application forms and documents
2. *Site drawing (located in LIRA report)*
3. Original priced write up(s) with copy of drawing
4. All letters to homeowner or landlord
5. Lead inspection and Risk Assessment results
6. Historic 106 review and Environmental Review
7. Proof of flood insurance, if necessary

8. Any other information that should be included in the permanent file

The Permit Technician calls the homeowner or landlord to schedule the date and time for the pre-bid, if necessary. The Permit Technician then mails a letter to homeowner or landlord to confirm the date and time along with a copy of the signed scope of work and emails letters applicable to contractors on the Contractor's Selection List. The Permit Technician prepares bid packages to include the "Instructions to Bidders," one copy of the "Bid" form, and a copy of the signed, non-priced work write-up. The Permit Technician prepares a "Tabulation of Bids" form and attaches it to an envelope that will contain the work write-ups for the pre-bid.

Pre-Bid Meeting

Once a scope of work has been approved by the homeowner or landlord, the job is put out for bids to city-approved contractors who have appropriate lead training and certification or will sub the work to a licensed lead abatement contractor. If an approved contractor already has several lead jobs to complete and cannot get to a new job in a timely manner, they will be excluded from new bids.

Optional: The Inspector/Risk Assessor will attend the pre-bid meeting along with the contractors wishing to bid on the work. All bidders must be present at the meeting. All bidders must be on the bid site within 15 minutes of the appointed time, unless prior arrangements have been made with homeowner and Inspector/Risk Assessor. During the pre-bid, the Contractors will need to ensure that they understand the full scope of work including applicable program standards.

The Inspector/Risk Assessor will answer specific questions. If there are any changes made to the scope of work during the pre-bid meeting, an Addendum to the Work Write Up will be sent to each bidder. The addendum will become a part of the bid. If the addendum changes the price of the work, the Inspector/Risk Assessor will create a new cost estimate. No bids will be accepted from contractors who do not attend the pre-bid meeting unless prior arrangements have been made. Bids are due within one week of the pre-bid meeting unless otherwise scheduled. Contractors shall submit bids as per the Bidding Instructions.

Bid Opening and Contract Award

City of Alexandria Community Development Department opens the bids. Each bid is opened, read aloud and recorded on the Tabulation of Bids sheet. Remediation staff reviews the bids to determine the awarded bidder. The bids are reviewed to see if the lowest bid within range has completed the bid forms correctly and if the contractor's math is correct. If not, then the tabulation of bid sheet is noted what the issue with the bid was and the next lowest bid is reviewed for the same qualifications. Once a bid has been awarded, then the Inspector/Risk Assessor gives the bid packages to the Program Manager for review. If the work is not awarded to any of the bidders then the job must be re-bid. *The owner and contractors are informed of the results of the bids. Any bids received that exceed \$20,000 on an individual property are considered "High Unit Costs" and must be approved by HUD before issuing Notice to Proceed.* Remediation staff mails to the homeowner and emails to each contractor that bid on the job, a letter and a copy of the "Audited Tabulation of Bids". (If the homeowner or landlord selects a bid other than low bid, they are required to pay the difference between the low bid and the bid they are selecting). If there are any changes made to the scope of work during or after bid has been awarded, a Bid Amendment will be signed by the

owner, contractor, and the City. The Bid Amendment will become a part of the contract.

Contract Signing

The Permit Technician will prepare three copies of the contract for signing. The contract is signed by the owner, the contractor and the City of Alexandria. The contract includes the responsibilities of each party and a copy of the signed, itemized work write-up is included with the contract along with the federal terms and conditions. After each party has signed the contracts, each will have an original to keep for their files.

Proceed Order

The "proceed order" is issued after contracts and, if necessary, loan documents are signed by all parties. At this point, a separate file is created for the construction work, the office file and building inspections.

1. Contract Progress Report
2. Proceed Order
3. Copy of contractor's line item bid

The construction file will also contain construction job files and contractor forms that will be given to the contractor at the pre-construction meeting. Copies of the LIRA will be contained in the construction file; one of the Inspector/Risk Assessor and one of the contractor. The owner and contractor shall also receive an original signed contract and proceed order form.

Pre-Construction Conference

Upon receipt of the construction work file, the homeowner or landlord, and contractor(s) shall be called by the Inspector/Risk Assessor, and a time scheduled to hold the pre-construction meeting. At the pre-construction meeting, the following will be established:

1. The starting and completion dates of lead hazard reduction, emergency repair, and rehabilitation work
2. The sequence of lead work, emergency repair and rehabilitation work
3. When and if progress payments will be executed
4. How occupant(s) and occupants' property will be protected if relocation is not necessary
5. A relocation plan, if necessary
6. The change order process
7. The cleanup and final clearance process
8. The owner will be provided a Material Selection and Approval Form by the contractor and submitted prior to the contractor's first request for partial payment
9. The owner must select and approve all material
10. Clarify any special situation
11. The work write-up(s) will be reviewed to ensure that each item is clearly understood
12. A pre-construction checklist will be completed and signed by all parties involved at the pre-construction conference. The checklist includes a means of resolving owner/contractor disputes and notifies the homeowner of the inconveniences that they may expect as a result of the work
13. The contractor is provided with the Request for Final Inspection form which must be

completed and turned in prior to staff final inspection

Relocation

Based upon the scope of work, the Inspector/Risk Assessor determines the level of occupant protection, and if relocation will be required. To ensure a safe environment, it must be determined if the occupant(s) must be relocated while the lead hazard reduction work is being done. This may be a costly but necessary step to protect the health of the occupant(s). All relocations must be approved by the Lead Grant Program Manager prior to relocation.

The City of Alexandria will have in place relocation procedures for occupants which conform to the requirements of the Uniform Relocation Act and HUD guidance on the vacating of units and treatment of homeowner/tenant possessions during lead hazard interventions. All temporary relocation is voluntary. Both homeowners and tenants are eligible for assistance. Although homeowners are not required to receive relocation assistance, they will be offered assistance if a documented hardship is made.

The decision to relocate is determined by the extent of the lead hazard reduction work. Homeowners and tenants may move in with relatives, or the City will secure housing in an extended stay motel that provides sleeping and living quarters, a bathroom and a kitchen. It is the intent of the program not to have residents relocated beyond four days. The relocation of residents shall be in compliance with the Program's Policy and Procedures. Allocations for relocation for four nights at \$90 per night has been estimated.

Contractors will be instructed and encouraged to minimize relocation requirements by preparing suitable hazard reduction and relocation work plans within the spirit and intent of HUD and EPA requirements. Reimbursement will not be provided by the grant for lost income. Occupant(s) will not be reimbursed for additional travel requirements incurred due to temporary relocation. Occupant(s) will not be reimbursed for other incidental additional costs incurred due to temporary relocation such as telephone, clothes washing, pet care, loss of perishable foods in the house, etc.

Lead Hazard Control Process

1. The construction phase includes daily inspections geared toward ongoing progress of work, processing of construction change orders and partial payments, as needed, performance of a punch list inspection, and final inspection.
2. The contractor will be expected to carry out the work in accordance with the schedule established in the contract and at the pre-construction meeting and in compliance with applicable program, state and federal lead regulations and standards including HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (June 1995 and as amended).
3. Any changes to the startup and completion dates must be documented with a Time Change Order.
4. Changes to the scope of work require the issuance of a Construction Change Order that is approved by the contractor, homeowner, Construction Specialist, Division Manager / or Program Manager and Department Director. All change orders should be routed through the Program Manager before being encumbered. The contractor must provide an opportunity for

the Inspector/Risk Assessor to view all work.

5. Work should be conducted in a manner as to minimize inconvenience to the occupant(s).
6. To ensure a safe work environment, the lead hazard reduction work must be performed prior to start of the emergency repair and/or rehabilitation work if possible.
7. The Inspector/Risk Assessor will be responsible for overseeing lead hazard reduction work as part of their overall monitoring responsibility for the program.
8. The lead hazard reduction contractor will be responsible for all State Environmental permits and inspections, as required.
9. After the lead hazard reduction work is completed, the Inspector/Risk Assessor will perform a punch list inspection.
10. Once the work is complete, a certified lead testing firm will perform a clearance examination. In the case of a failed clearance, the costs of re-cleaning and re-testing for clearance is the responsibility of the lead contractor.
11. Once the unit has cleared, the construction specialist must determine if the home can be re-occupied. The owner must be provided with a copy of Clearance Report upon completion of the lead hazard control work. Normal lead hazard reduction work should take no longer than two weeks.
12. Upon satisfactory completion and inspection, the Inspector/Risk Assessor will schedule a final inspection, which will be attended by the contractor and owner, to ensure that all work has been completed. After this meeting, the contractor must submit any warranty documents.
13. The Inspector/Risk Assessor should make sure that the owner is aware of the dangers of lead hazards and the need to monitor the lead hazard reduction work to their home.
14. The owner should be advised to do annual visual inspection.
15. They should be strongly advised to do a thorough wet cleaning of surfaces that tend to accumulate dust on a monthly basis.
16. The owner signs an on-going maintenance form.
17. In the office, a final combined office and construction file is compiled. This file will be maintained in the office for a period of at least five years from the close out of the grant. Jobs that were of a particularly difficult and sensitive nature will be maintained for a longer period.

Clearance Procedures

Upon completion of the lead remediation process, a state Certified Lead Inspector will perform a visual inspection and clearance test in accordance with HUD requirements and check for deteriorated paint and look at repairs to make sure they are still within regulations. The thresholds for clearance match the Office of Lead Hazard Control and Healthy Homes (OLHCHH) thresholds of:

Floor < 10 ug/ sqft;
Window Sills < 100 ug/ sqft;
Troughs 100< ug/ sqft
Porch Floors <40.

The owners will be given an "On-going Monitoring and Maintenance Acknowledgment Form" and a copy of HUD's Chapter 6, "Ongoing Monitoring from the Guidelines for the Evaluation and Control of Lead-Based Paint hazards in Housing". The homeowner/ rental property owner signs two copies

of the acknowledgment form: one copy is retained by the homeowner/ rental property owner, and one copy is filed in the unit file.

Lead Grant Unit File

In the permanent unit file, copies of documents are kept in a Lead Hazard Control Unit file by the Program Manager or Permit Technician, which will be listed on a future Lead Hazard Control Unit File Checklist. These documents shall include:

1. Copies of letters/correspondences with owners and/or tenants.
2. Lead Safe Housing Program Application Form (The signed original application and income documents: most recent tax return of all working occupants, documentation of any other income).
3. A Lead Questionnaire (Verifies child occupancy and blood test information).
4. A copy of the Environmental Review and Historic Review Part 1 (Part 2 also, if necessary)
5. Tax Assessor Card (Showing date unit was built)
6. Inspection/Risk Assessment, and other reports if applicable.
7. Scope of Work with Cost Estimates and photographs of property
8. Notice to Owner of Inspection/Risk Assessment Results (Within 15 days after date of Inspection/Risk Assessment)
9. Tabulation of Bids
10. Pre-Construction Checklist
11. Material Selection Form
12. Contract
13. Inspection Form
14. Partial payment Request(s)
15. Change Order(s)
16. Relocation Documents and Invoice(s)
17. Clearance Report
18. Final Invoice
19. On-going Monitoring and Maintenance Form
20. Any other pertinent information that should be included in the permanent file for the job

Database Maintenance

Throughout the Lead Hazard Control process, activity dates and other applicable information and data are entered into the Applicant Databases for ease in periodic program monitoring and reporting.

CITY OF ALEXANDRIA

OCCUPANT PROTECTION PLAN Checklist for Lead-Based Paint Activities

Address _____ Unit Number (if applicable) _____

City _____ DE _____ Zip _____

Abatement INTERIM CONTROL W/ OCCUPANT

Lead Contractor Name _____ DHS Certification Number Contractor _____ Telephone Number
(_____) _____

Project Date(s) (mm/dd/yy) _____

OCCUPANT PROTECTION PLAN CHECKLIST FOR LEAD-BASED PAINT ACTIVITIES

This is a checklist of actions the contractor will take to protect the occupant(s,) while paint is disturbed. Occupant(s) must stay out of work areas while work is in progress. The contractor will do daily clean-ups, but the work area may still contain dangerous levels of lead dust. Unless otherwise noted, work will be done by the contractor.

Occupant Location (Check all that apply)

- Unit is vacant (no movable objects remain in the unit; i.e. stove, refrigerator).
- Occupant(s) will be relocated and out of the unit until the lead project is done.
- Occupant(s) will not be allowed within the work area before project completion, including clearance with documented dust wipe sample results.
- Occupant(s) will not be allowed within the work area before project completion, including mandatory visual clearance.
- Occupant(s) will be outside the dwelling during work times but may return each day after clean up.
- Occupant(s) will have lead-safe passage to bathroom, living area, and entry/exit door during the project.
- Occupant(s) will be provided a lead-safe entry and exit pathway during the project.
- Occupants' pets will not be allowed in the work area.

Describe your daily work plan on protecting the family while doing work. Include a diagram if necessary.

Furniture (Check all that apply)

- Will inform Occupant(s) to remove all personal items and as much furniture as possible from work area before work begins.
- Will cover with plastic all furniture and personal belongings that cannot be removed.

Containment and Barrier System (Check all that apply)

Interior Work

- Will use a dust room for work on removable components such as windows and doors.
- Will use an airlock flap on all doorways to work areas (Z-flap), or will close and secure doors from inside the work site.
- Will use plastic to cover entire floor, all worker pathways to exit and any workrooms.
- Will use plastic to cover floor extending 5 feet beyond work area in all directions and where it is practical.
- Workers will stay on plastic.
- Will inform Occupant(s) to keep off of plastic in work area.
- Will lock or firmly secure work area to provide an overnight barrier.
- Will post warning signs at entry to each room where work is being done, or will post warning signs on the building exterior near main and secondary entryways.

Describe or diagram your interior work containment and barrier system:

Exterior Work (Containment and Barrier System continued)

- Will remove all movable items (playground equipment, toys, sandbox, patio furniture, etc.) to a distance of 20 feet from work area or seal these items with plastic and tape.
- Will use plastic sheeting or landscape fabric on the ground extending 10 feet from building, where practical.
- Will keep all windows, including windows of adjacent dwellings, within 20 feet of work closed.
- Will erect barrier tape or temporary fencing to make a 20-foot perimeter around building.
- Will post warning signs on the building exterior near all entryways.

Describe or diagram your exterior work containment and barrier system:

Window Work

- Will tape plastic to exterior wall when removing windows from the inside.
- Will tape plastic to interior wall when removing windows from the outside.
- Will use plastic sheeting or landscape fabric on the ground under the windows.

Describe or diagram how your window work containment and barrier protection system:

Restricted Work Practices (Check all that apply)

- Will use a heat gun, not to exceed 1100 degrees Fahrenheit.
- Will use machine planer, chipper, grinder, or sander that is attached to a properly operating HEPA-filtered vacuum. Will use proper containment while using any of these machines.
- Will use chemical paint stripper to remove lead-based paint from components and will follow manufacturer instructions.
- Will use power washing or hydro-blasting. Will use proper containment to prevent the waste generated from contaminating soils or surface waters.
- Will remove components such as complete door systems, siding, walls, cabinets or trim. Will use containment to isolate areas where paint is being disturbed from the rest of the property.
- Will use abrasive blasting or sandblasting. Will use containment to isolate areas where paint is being disturbed from the rest of the property while using either of these practices.

Ventilation System (Check all that apply)

- Will turn off system and seal all vents in workroom with plastic.
- Will turn off system and seal off vents within 5 feet of the work area.

Daily Cleaning (Check all that apply)

- Will remove debris from dwelling or store it in a locked secure area.
- Will clean all horizontal surfaces in the work areas with a HEPA vacuum and wet washed.
- Will clean and remove plastic walkways each day.
- Will clean all walkways that are used as pathways to the work area with a HEPA vacuum.
- Will clean if containment is breached on both sides of the containment.
- Will clean off debris, fold, and secure all plastic sheeting or landscape fabric overnight but may use again the next day.

Final Cleaning (Check all that apply)

- Will remove all debris and visible dust.
- Will HEPA vacuum; wet wash and HEPA vacuum all horizontal surfaces and trim in work areas.
- Will HEPA vacuum, wet wash, and HEPA vacuum all surfaces and floors extending at least 5 feet in all directions from treated surface.

LIST ALL WORKERS ASSIGNED TO THIS UNIT:

FIRMS MUST PROVIDE A DAILY SIGN IN SHEET OF WORKERS.

LEAD CERTIFIED CONTRACTOR

I certify that the above checked methods were used to protect the occupant(s) and property from lead based paint hazards.

SIGNATURE – Certified Lead Contractor

Date Signed (mm/dd/yy)

DAILY Work Site Checklist

Start work date: _____ Projected End date: _____

Unit Address:
Date:
Time:
Contracting Company:

	YES	NO	N/A
Badges worn while working			
All Personal Protective Equipment (PPE) worn			
Work site properly set up (floor & furniture covered, ventilation system covered)			
HEPA VACCUMS ON SITE			
EVIDENCE OF PROPER CLEANING PRODUCTS (TSP, ETC)			
PROPER CONTAMINATION & BARRIER SYSTEMS (CONTROLLING LEAD HAZARDS PROPERLY)			
THREE-BUCKET CLEANING SYSTEM			
Designated eating area			
Designated decontamination area			
Warning signs at all Entrances and Exits			
Waste storage container (w/warning sign)			
Work area roped off from public			
Shut off and locked electric box (w/warning sign)			
Any workers smoking			

Photos taken at site (Y or N)

Scope of work for the day (LIST OR ATTACH SOW with highlighted day's work):

<u>Room / Area</u>	<u>Component(s)</u>	<u>Notes:</u>

Comments:

Follow Up:

INSPECTED BY: _____

Contractor Site Supervisor / Management