



Dates of Visual Assessments	Names of Staff completing Visual Assessments

Dates of Repairs	Names of Certified Staff/Contractors Performing Repairs

Dates of Clearance	Names of Independent Certified Clearance Staff and Firms

\*De minimis levels are defined as:

- 20 square feet on exterior surfaces.
- 2 square feet in any one interior room or space; or
- 10 percent of the total surface area on an interior or exterior type of component with a small surface area (such as windowsills, baseboards, and trim).

\_\_\_\_\_  
YWCA Staff Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Certified City Representative (Cite of: \_\_\_\_\_)

\_\_\_\_\_  
Date

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Title: Lead Safe Housing Rule - Tenant Based Rental Assistance

Last Updated: June 2023

Reference: [HUD Exchange: Lead Safe Housing Toolkit](#), YWCA Internal Procedures

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## **POLICY**

YWCA will ensure all units have met the requirements of the Lead Safe Housing Rule Subpart A, B, and M prior to issuing CoC rental assistance funds.

### **Forms Needed:**

- 1) Lead Safe Housing Requirement Screening
- 2) Log of Visual Assessments
- 3) Disclosure Form
- 4) [‘Protect your Family from Lead In Your Home’ EPA Pamphlet](#)
- 5) Participant Lead Safety Notice
- 6) Visual Assessment Findings and Resolution Record
- 7) Certification of Ongoing Monitoring and Maintenance
- 8) [Owner’s Guide for Responding to report of an Assisted Unit with Occupant Child <6 with an EBL](#)

## **PROCEDURE**

- 1) All YWCA CoC HUD funded employees will complete the Visual Assessment Training through the HUD Exchange upon hire and annually thereafter. The employee will send the certificate of completion to their supervisor.
- 2) All YWCA CoC HUD funded employees will be trained on HUD’s Lead Safe Housing Rule upon hire, and on an ongoing basis, to ensure document compliance, procedure adherence, and understanding of the roles and responsibilities of YWCA employees and Owners.
- 3) When a DV Bonus Participant has located housing of their choosing in the community, the Housing Advocate will complete the following documents and processes:

If a unit was built <b>AFTER</b> January 1 <sup>st</sup> , 1978, the following two documents are the <b>ONLY</b> Lead Safe Housing Rule documentation required in the client file. These documents are YWCA’s responsibility to complete.			
<b>DOCUMENT</b>	<b>RECORDS</b>	<b>APPLICABILITY</b>	<b>FREQUENCY</b>
Lead Safe Housing Requirements Screening	Completed by YWCA, filed	All assisted units, regardless of when they were built.	Complete at move in for each new Participant and property.
Property Assessment Information from city (to document year property was built)	Completed by YWCA, filed		

The following documents and procedures only apply to properties built <b>BEFORE</b> January 1 <sup>st</sup> , 1978, <b>AND</b> if a child under six lives in the household (is on the lease). These documents are YWCA's responsibility to complete and/or provide to the Participant.			
DOCUMENT(S)	RECORDS	APPLICABILITY	FREQUENCY
Lead Based Paint Disclosure Form	Signed by Participant, and Landlord, filed	Properties built after 1978 with a child under six in the household.	Complete at move-in for each new Participant and property, and annually thereafter.
Lead Based Paint EPA Brochure: "Protect your Family from Lead"	Provided to Participant		
Participant Lead Safety Notice	Provided to Participant, signed copy filed		
Perform Visual Assessment and document results in Log of Visual Assessments	Completed by YWCA, filed		

The following documents and procedures only apply to properties when lead-based paint hazards have been identified during a visual assessment <b>AND</b> if a child under six lives in the household (is on the lease). The Owner is responsible for lead-based paint hazard remediation and YWCA will ensure compliance with HUD guidance.			
DOCUMENT(S)	RECORDS	PROCESS	APPLICABILITY
Log of Visual Assessments	Copy given to Owner/Landlord	Copy of Log of Visual Assessments given to Owner/Landlord for property where lead-based paint hazard is identified.	Completed by YWCA at move in and annually thereafter. Filed in Participant file for reference and records.
Visual Assessment Findings and Resolution Record	Completed by YWCA and filed, copy given to Owner/Landlord	Given as notice to Owner/Landlord that a visual assessment identified lead-based hazards in a property they own/operate. Provides instruction on next steps.	Completed immediately after lead-based paint hazards have been identified in an assisted property. Provided to Owner/Landlord within 24 hours.
Certification of Ongoing Monitoring and Maintenance	Completed by YWCA and filed, signed by City Representative, copy given to Owner/Landlord	Details the monitoring and maintenance of the property while lead-based paint hazards are being remedied. Documents names of visual assessors, contractors, and independent clearance firms.	Completed after hazards have been remedied and the property has been cleared.  *Can be edited to reflect various steps taken to clear property of lead-based paint hazards.
<a href="#">Hazard Reduction Model Toolkit</a>	Completed by Owner/Landlord, YWCA will obtain copies of notices given	YWCA will provide the Owner/Landlord with information from the Hazard Reduction Model	This toolkit is used when lead-based paint hazards have been

	to Participants and clearance reports.  YWCA, to the best of its ability, will ask for confirmation for Owners/LL are compliance with applicable notices, regulations, and reporting.	Toolkit on the HUD Exchange to ensure proper repair and maintenance.	identified <b>above</b> the LSHR de minimis area.  *Toolkit is used whenever renovation, remodeling, repair, or painting occurs in a pre-1978 property. Standards also used for lead hazard reduction activities.
Lead Safe Housing Rule Screening			If lead-based paint hazards have been identified that are <b>below</b> the LSHR de minimis area, Part 2 of the Lead Safe Housing Rule Screening may be completed to determine hazard removal options.
*For maintenance work in units without occupants under six years of age: If YWCA is made aware of work disturbing paint in pre-1978 assisted properties that is above the Renovation, Repair, and Paint (RRP) rule de minimis level, YWCA will provide the Owner/Landlord with the <a href="#">LSHR-RRP Handout</a> .			

- 4) Should an inspection identify concerns or issues related to lead-based paint, or a child under 6 is showing signs of EBLL, YWCA employees will coordinate with the property owner, health care providers, and/or public health officials to remedy the hazard and ensure the safety of all household members. The HUD Exchange has lead based paint [toolkits](#), checklists, templates, and guidance that grantees and owners are required to follow. If a child with EBLL is identified in an assisted unit, YWCA Cass Clay will reference and adhere to HUD guidance. If necessary, YWCA Cass Clay will seek out further guidance from HUD officials.
- 5) YWCA will provide Owners/Landlords a copy of this [Owner's Guide for Responding to report of an Assisted Unit with Occupant Child <6 with an EBLL](#) at lease signing to provide clarity around roles, responsibilities, and required responses to a child with EBLL.
- 6) YWCA, Fargo Cass Public health officials and North Dakota Department of Health officials visited at length about the possibility of sharing personally identifying information to meet the quarterly data sharing requirement regarding lead-based paint. The result concluded federal privacy laws for all entities preclude the sharing of such information. As a result, Fargo Cass Public Health provided a letter to YWCA indicating the agency does not wish to receive quarterly reports regarding children under six in assisted units built before 1978.
  - a) "Based on our communication, you have made it clear YWCA has active engagement with landlord and property owners and performs Housing Quality Standards (HQS) Inspections and Visual Assessments on each assisted unit/property per your federal regulatory agencies. Should these inspections identify concerns or issues related to lead-based paint, or a child six years of age and under is showing signs of EBLL, we understand YWCA employees will coordinate with the property owner, health care provider, and/or local public health officials to remedy the problem and ensure the safety of all household members. Additionally, I understand information is provided to tenants upon entry to the YWCA

supported housing program regarding lead-based paint. Given this proactive approach, FCPH does not wish to receive a quarterly report from YWCA of all tenants six years of age and under residing in YWCA supported housing built before 1978.”

- b) Proactive measures between the agencies were discussed and all parties will work to provide support, resources, and care to those in DV Bonus Program experiencing EBLL.

Participant Name: \_\_\_\_\_ Program: \_\_\_\_\_

Unit Address: \_\_\_\_\_

Property Owner/Landlord: \_\_\_\_\_

Phone: \_\_\_\_\_ Email: \_\_\_\_\_

You are receiving this notice because your unit is subject to federal Lead-Safe Housing Regulations.

- 1) In general, you must keep your unit reasonably clean and free of dust and debris.
- 2) You are requested to notify your property manager/owner at the contact point noted above in the event you see any deteriorated paint in your unit or common areas servicing your unit (building entryway, hallways, laundry room, play equipment, etc.). You may be asked to send pictures, if feasible. This includes any paint that is chipping, peeling, cracked or being rubbed off the surface that may be caused by friction or impact, such as a door jamb, stairs, or window. This also includes any painted surface that is damp, or water damaged in any way, even if the paint is still intact.
- 3) During any time when repairs of deteriorated paint are being undertaken in your apartment/unit, you are required to stay out of the designated work area, and if needed you may be asked to take other measures like staying with a relative or alternative housing site until the work is completed and cleared of all dust-lead hazards.
- 4) You must report and include on your lease all occupants including any child under 6 years old who will occupy your unit, including their full name and birth date and the expected date of their occupancy of the unit.
- 5) In the event a child under 6 years old who occupies your unit is identified through a confirmed medical test to have an elevated blood lead level (EBLL), your unit will be evaluated (tested) for the presence lead-based paint, dust, and soil-lead hazards as well as other potential exposure like toys, imported medicines or foods, or even take-home lead. You are requested to immediately inform the property manager or owner at the contact noted above. For further information you are encouraged to contact your local public health department at (phone number).
- 6) You are encouraged to retain and periodically review the pamphlet you have been provided: "Protect Your Family from Lead in Your Home" or visit: [www.hud.gov/lead](http://www.hud.gov/lead) and [www.epa.gov/lead](http://www.epa.gov/lead).

\_\_\_\_\_  
Participant Signature – acknowledging receipt of notice

\_\_\_\_\_  
Date

Participant Name: \_\_\_\_\_ Program: \_\_\_\_\_

Unit Address: \_\_\_\_\_

Property Owner/Landlord: \_\_\_\_\_

Phone: \_\_\_\_\_ Email: \_\_\_\_\_

Visual Assessor Name: \_\_\_\_\_

Phone: \_\_\_\_\_ Email: \_\_\_\_\_

All visual assessments must be documented. This record is being generated because deteriorated paint was identified by a visual assessor in a property assisted by federal funds and must be addressed by the property owner and re-inspected by (date)\_\_\_\_\_.

Deteriorated paint was found on the following interior, exterior and common area surfaces:  
(Identify room and specific surfaces including common and exterior areas)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Deteriorated paint and underlying conditions e.g. damaged, unstable, or wet surfaces were identified in the following rooms and areas:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_ Check if photos were taken of deteriorated paint surfaces for records and include as enclosure.

These conditions must be corrected by qualified workers (trained, certified EPA Renovators) and the **Worksite Certification** and **Third-Party Clearance Report** completed and submitted by email or in-person to the identified assessor, by the date above. The assessor will notify you if a follow-up physical inspection is required.

\_\_\_\_\_  
**YWCA Staff Signature**

\_\_\_\_\_  
**Date**