

POLICY GUIDANCE NUMBER: 2024-09

DATE: May 23, 2024

SUBJECT: Purpose and Use of Healthy Homes Supplemental Funding (HHSupp)-Revised

STATUS: Current

APPLICABILITY: Lead-Based Paint Hazard Reduction (LHR) and Lead Hazard Reduction Demonstration (LHRD) grantees

RELATED GUIDANCE: Supersedes 2016-01, which required use of the Healthy Homes Rating System for grants that use Healthy Homes Supplemental Funding

What is Healthy Homes Supplemental (HHSupp) funding?

Healthy Homes Supplemental (HHSupp) funding for the Office of Lead Hazard Control and Healthy Homes' (OLHCHH's) lead hazard reduction grant programs¹ is used for identifying and remediating multiple housing-related health and safety hazards, other than lead-based paint hazards. HHSupp funding comes from the Office's annual budget line for the Healthy Homes Initiative, provided pursuant to sections 501 and 502 of the Housing and Urban Development Act of 1970.

What is the purpose of the HHSupp?

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

What is the process for remediating hazards using HHSupp funding?

The process for identifying and remediating health and safety hazards in homes using Healthy Home Supplemental funding includes:

- 1) Develop work plan and policies and procedures;
- 2) Complete a healthy homes assessment based around the <u>8 healthy homes principles;</u>
- 3) Develop the scope of work that prioritizes home health hazard remediation activities identified in the grantee's workplan and address the needs and health of the residents;
- 4) Remediate the health hazards;
- 5) Do final walkthrough to make sure the unit scope of work is completed;
- 6) Complete distribute and file reassessment and clearance report.

Develop Work Plan and Policies and Procedures:

The work plan and policies and procedures should include the following information prior to the start of any healthy home unit work remediation:

- Identify who will be completing the healthy homes assessment and scope of work, and their qualifications for performing those activities.
- Identify when the assessment, bidding, unit work completion and reassessment will occur within the unit production process.
- Describe in detail how the hazards found on assessment will be prioritized by the program for consideration in scope of work. Include any definitions relevant to the prioritization approach.
- Identify the number and average work cost of healthy home units to be completed.
- Describe the priority issues the grant program will seek to invest remediation in when found in enrolled units, and why.
- Describe the intervention approach that is being sought for each of the priorities and what variables would trigger any different level of intervention as applicable.
- Describe how the assessment, prioritization, report scope, invoicing and reassessment will be completed and documented in the unit file.
- Describe your process of paying invoices and funding flow.

Healthy Homes Assessment Process/Scope of Work:

A healthy home assessment for identifying hazards should include:

- Description of hazard categories to be identified in the Healthy Homes Assessment, and the documentary source(s) of the categories.
- Supportive documents such as pictures of the hazards being addressed is highly recommended for cost justification of unit activities.
- The assessment report should include recommendations to address prioritized hazards identified.
- The Scope of Work should match the remediation recommendations made from the assessment report and include the hazards that have identified to be remediated, the tasks necessary to complete the remediation, the estimated cost of the work, and the material and specifications to be used in the remediation.

<u>NOTE: If the HHSup per unit cost exceeds \$15,000, please let your GTR know prior to commencement of the work.</u>

<u>Remediate Hazards</u>

Remediation must be based on the scope of work developed following the healthy home assessment, and the prioritization of each hazard per the work plan priorities and resident needs. As with the lead hazard evaluation and reduction work conducted under the grant, the grantee is responsible for the development, procurement, and monitoring of work completion in each unit and common area. All work completed using these funds must be administered in compliance with local and program requirements, including using certified contractors, licensing, permits, and insurance when they may be required, e.g., mold remediation, plumbing, electrical, radon, or asbestos work.

Do final walkthrough to make sure the unit work is completed

Program personnel must conduct a follow-up inspection and assessment following remediation of the hazards addressed in the scope of work. Results of the reassessment must be evaluated and documented to ensure the hazards were addressed adequately to reduce the risk of injury. If the hazard still exists, the grantee must document the hazard and take steps to ensure that the scope of work is completed, prior to completing the Clearance Report.

Complete, Distribute, and File Reassessment and Clearance Report

The Clearance Report must be maintained in the case file for the home where HHSupp funds are being expended.

What documentation must be provided to owners and occupants?

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

- A copy of the home inspection and assessment;
- A copy of the Healthy Home Hazard Summary Report; and
- A copy of the Clearance Report.

HHSupp Allowable Costs/Restrictions

Allowable HHSupp Costs

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

- Conducting the healthy homes assessment, including the costs of Inspection equipment; and Secondary inspections as required, including inspections by structural engineers, electrical engineers, and other follow-up investigators;
- Developing the scopes of work and associated reports;
- Remediating the hazards identified in the scope of work, including the costs of materials used to remediate hazards;
- o Educational Materials individualized to hazards identified in enrolled housing units
- Training for staff, subrecipients, contractors, or Community Health Workers (CHW) that relates to and builds capacity for Healthy Homes assessment and home health hazard remediation (must be pre-approved by GTR prior to cost incurred)
- Reassessing the completed work and clearance.

Restrictions on Use of HHSupp Funds

• HHSupp funding is used for identifying and remediating multiple health and safety hazards in homes. HH Supp funding may **only** be used in homes where lead hazard reduction work (interim controls or abatement) is being conducted; however, grantees who receive lead hazard reduction funds with HHSupp funds are **not** required to expend HHSupp funding in every home where they expend lead hazard reduction funds. The decision is the grantee's (including its sub-grantees and contractors in the decision-making process, to the extent the grantee sees fit).

- Successful use of HHSupp funding is dependent on a complete and thorough inspection and assessment of a home that identifies hazards for all vulnerable populations residing or likely to reside in the home.
- A healthy homes assessment, as used here, is the technical and analytical room-by-room (and exterior) inspection for residential health and safety hazards. Residential problems would include: water leaks, holes in floors, signs of pests, no electrical wiring, etc. See the section on Helpful Resources, below, for links to sample guidance, codes, and ordinances that may be of interest in identifying residential health and safety hazards.
- The HHSupp healthy home assessment is like a lead-based paint risk assessment in that it should utilize the analytical information from the room-by-room (and exterior) inspection to connect the inspection results to any unique characteristics of the location, materials, use patterns and layout of the home that would contribute to the potential risk of illness or injury that could be posed by the identified home hazard(s).

A grantee, sub-grantee, or vendor/contractor must <u>not</u> use HHSupp funds for the following:

- Salaries and Fringe for any persons NOT completing eligible work tasks;
- Administrative Costs;
- Travel;
- Outreach;
- General (non-housing unit specific) educational materials
- Supplies outside of the scope of interventions to address hazards identified within individually completed Healthy Homes Hazard Summary Reports; and
- Research.

Grantees are encouraged to identify additional resources within their communities that can address needs of individual participants that fall outside the scope of HHSupp funds.

Should you have any questions, please contact your Government Technical Representative.

Helpful Resources

Guidance

- Centers for Disease Control and Prevention and U.S. Department of Housing and Urban Development. Healthy Housing Reference Manual.
 <u>www.hud.gov/program_offices/healthy_homes/</u> or www.cdc.gov/nceh/publications/books/housing/housing_ref_manual_2012.pdf.
- Overview of the Healthy Home Rating System. (Includes HHRS operating guidance, hazards chart, scoring tools, and other materials, for use on units evaluated under that System before July 1, 2017, and for units evaluated under that System since then for which the grantee has GTR approval for addressing in accordance with the HHRS.) www.hud.gov/program offices/healthy homes/hhrs

Housing Codes

- State Housing Codes
 - Healthy Housing Solutions, Housing Codes, <u>http://healthyhousingsolutions.com/hhtc/state-housing-codes/ (includes a state-by-state directory of housing codes)</u>

- National Conference of State Legislatures, Healthy Homes, <u>www.ncsl.org/research/environment-and-natural-resources/healthy-homes.aspx</u> (includes a directory of state laws regarding the health of a home environment)
- Local Ordinances
 - o Municode, library.municode.com
 - o General Code Library, <u>www.generalcode.com/webcode2.html</u>