



**City of Elmira, New York**  
**Department of Community Development**  
**Lead-Based Paint Hazard Control Program**

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## **WORK PLAN**

**MAYOR DANIEL MANDELL**

**ELMIRA CITY COUNCIL**

**FIRST DISTRICT: NICHOLAS GRASSO**

**SECOND DISTRICT: BRENT STERMER**

**THIRD DISTRICT: JOSEPH H. DUFFY**

**FOURTH DISTRICT: MARK FRANCHI**

**FIFTH DISTRICT: TORY KITCHING**

**SIX DISTRICT: NAN MOSS**

**CITY MANAGER**

**P. MICHEAL COLLINS**

**PROGRAM DIRECTOR**

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City of Elmira, Dept. of Community Development  
Lead-Based Paint and Hazard Control Work Plan

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# Department of Community Development Lead-Based Paint Hazard Control Program

## Goals and Objectives

The goal and objective of the City of Elmira's Lead Based-Paint Hazard Control Program is to protect families from negative health impacts of lead-based paint. The City has a high percentage of pre-1978 housing units. The result has been a rate of children testing positive lead poisoning higher than the New York State average. Young children are especially at risk for the harms associated with lead-based paint, and even low-levels of exposure can increase the likelihood of behavior problems, learning disabilities, seizures, and, in extreme cases, death. This program, between years 2020-2023, will provide an estimated 60 plus homes in the City of Elmira the ability to address lead hazard control, additional funds through the Healthy Homes supplemental would allow some of these homes the opportunity for repairs beyond lead, to create safer and healthier homes within the City of Elmira. Only units receiving Lead Based-Paint Hazard Control funds are eligible to receive Healthy Homes supplemental funding.

## Program Management and Evaluation

The Lead-Based Paint Hazard Control Program will be housed within the City of Elmira's Department of Community Development. The City of Elmira has a population of 29,204 residents. The City of Elmira envisions a Community Development Program that provides residents with a high quality of life in neighborhoods which are safe, clean and friendly. The focus of the Department is on providing a healthy supply of affordable, accessible and decent housing for low- and moderate-income homeowners and renters. The City's vision also includes investing in community and economic development projects that will revitalize and enhance the local commercial and industrial economy. The Department works with many agencies and operates several programs to accomplish these goals.

The Department of Community Development is overseen by a department head, who reports directly to the City Manager and the Mayor. The City of Elmira has six City Councilmembers who are elected for a four-year term, each of whom represents on a city district of approximately one square mile.

The Department of Community Development will be the lead department for the Lead Based- Paint Hazard Control Program and will have the following dedicated staff for the program: Program Director, Finance Director, Program Coordinator, and a Program Manager. For the Lead-Based Paint Hazard Control Program, the Department of Community Development, with support from the Chemung County Health Department, will serve as an advisor to the community and business interests, healthcare providers, public health officials, housing rehabilitation agencies, real estate firms, banks and lending institutions, and private contractors regarding lead-safe housing in the City of Elmira.

## Program Staffing

**The Project Director is a full-time position** who oversees the entire Department. The position provides the direction and vision for programing and will ensure that the Lead Based-Paint Hazard Control Program has the necessary funding, legal, and political support in-order to be successful. The Director will be responsible for: supervision of project staff and program policy, and implementation.

The Director will work closely with partner organizations to promote and administer the program successfully. The Program Director will be responsible for planning, directing and coordinating with other existing housing and housing related programs within the City of Elmira. Of the time the Director devotes to this program, 40% will be towards administrative oversight and 60% will be program implementation.

**The Finance Director is a full-time position** for the entire Department. The Finance Director is responsible for the fiscal oversight and fiduciary management of the department. The Finance Director will work closely with the Project Director and Program Manager to review all bid proposals for contracting services, review and process all payment requests, and submit and manage grant funding draws, and manage the financial accounting for the program. Of the time the Director devotes to this program, 100% will be towards administrative activities.

**The Program Manager is a full-time position, of which 100%** will be devoted to the management and implementation of the Lead-Based Paint Hazard Control Program. The Program Manager will be responsible for awarding contracts, issuing Notice to Proceeds, and will also assist in the relocation for clients. The Program Manager will work full-time to write lead hazard control work specifications and inspect the completed work for payment. The Program Manager will serve as the Lead Program's liaison to the Chemung County Lead Coalition. Additionally, the Program Manager will prepare contracts with contractors, grantees, and monitoring contracts for compliance. The Program Manager is responsible for all activities to be implemented/developed in the work plan; and, preparation of reports to HUD. The Program Manager will spend 35% on program administration and 65% on program implementation.

**The Program Coordinator is a full-time position in the Department, of which 25%** will be devoted to the Lead-Based Paint Hazard Control Program. The Program Coordinator will provide support in the administration, processing and management of clients' data, including conducting intakes and outreach to community members. The Program Coordinator will work closely with the Program Manager to facilitate and assist the day-to-day operations of the Lead-Based Paint Hazard Control Program. Of the time the Program Coordinator devotes to the program, 50% is administrative and 50% is program implementation.

#### **Department of Community Development Staff and Titles**

- Emma Miran, Director of Community Development, designated **Project Director**
- Missie Grover, Director of Finance
- Suzie Rundell, Grant Administrator
- Mitra Pratt, Program Manager
- Linda Sowers, Program Coordinator
- Lawrence Bocage, Inspector (part-time)

#### **Program Location – Target Area**

##### **Community Target Area and Need**

Chemung County has a 15.1% incidence of confirmed high blood lead levels (10 or higher 10 mcg/dl). Higher than the Finger Lakes Region (10%) and NYS (4.3%). (2013-2016 NYS Child Health Lead Poisoning Prevention Program Data as of June 2018).

Target Area Data	Target Area Results	Comparison Data	Comparison Data Results	Justification of need percentage
<b>Pre-1978 Housing Units</b>	11,956	Total Housing Units (ALL)	12,720	94%
<b># of Children under 6 years of age</b>	2,188	Total Population (ALL AGES)	31,899	7%
<b># of Low-Income Families</b>	6,826	Total Population	31,899	21%

According to 2000 Census the population of Chemung County was 91,070, and a third of the population residing in the City of Elmira. Research shows that children under age six are at greatest risk, particularly those who live in areas with high poverty, low educational attainment, and high percentage of black race. Table 1A and 1B summarizes these population risks.

**Table 1A: Overview of population at risk**

	Population 25+ not graduated from high school			Black		
	N	#	%	N	#	%
<b>Elmira</b>	19,147	4,936	25.8%	30,940	3,961	12.8%
<b>Non-City*</b>	41,649	5,971	14.3%	60,130	1,216	2%
<b>County Total</b>	60,796	10,907	17.9%	91,070	5,177	5.7%
<b>State</b>	12,542,536	2,626,324	20.9%	18,976,457	2,986,242	15.7%

\* Of those living outside the City of Elmira; includes other urban areas

**Table 1B: Overview of population at risk**

	Total Population		# of children <6 and under living in poverty			Population for whom poverty status is determined: Income in 1999 below poverty level		
	#	% of County total	N (total kids <6)	# kids <6 in poverty	% kids <6 in poverty	N	#	%
<b>Elmira</b>	30,940	34%	2,570	856	33.3%	27,237	6,286	23.1%
<b>Non-City*</b>	60,130	66%	3,840	547	14.2%	58,158	4,777	8.2%
<b>County Total</b>	91,070		6,410	1,403	21.9%	85,395	11,063	13%
<b>State</b>	18,976,457		1,491,866	308,272	20.7%	18,449,899	2,692,202	14.6%

\* Of those living outside the City of Elmira; includes other urban areas

The City of Elmira has higher risk factors than the remainder of the county. Housing units that were built before 1950, are rented (as opposed to owner occupied), and in poor condition are also more likely to have lead hazards. Elmira has approximately three quarters of the housing built before 1950 and 52% rented (Information obtained from final report: Childhood Lead Poisoning in Chemung County: Building Local Capacity and Coalitions, 2009).

The Greater Upstate Law Project Inc. illustrated cities in New York State with the highest number of high-risk households, defined as pre-1950 units owned or rented by low-income families with

children under 6 years of age; out of 29 municipalities listed, Elmira is 19th highest for number of high-risk households.

### **Elevated Blood Levels**

The definition of elevated blood lead level for the City of Elmira is set by the New York State Department of Health Public Health (NYSDOH) Law (NYCRR Title X, part 67) in which the local health department complies to. Section 67-1.1 defines an elevated blood lead level as a blood lead concentration equal to or greater than 10 micrograms per deciliter of whole blood. The NYSDOH revised the law, effective October 2019, to define an elevated blood lead level as a blood lead concentration equal to or greater than 5 micrograms per deciliter of whole blood.

The New York State Department of Health Public Health Law requires that “Physicians/authorized providers who provide medical care to children or pregnant women shall screen or refer them for screening for elevated lead levels at the intervals and using the methods specified in such regulations” (New York State Department of Health, June 2009). Testing must occur for children at well-child visits or at least annually for children at least six months of age but under six years of age. Pregnant women are assessed at each prenatal visit using a risk assessment tool and tested/referred if high risk. The Chemung County Health Department receives lead test results of every test that is done for Chemung County children through the Health Commerce System. Those with elevated lead levels are targeted for case management, and the City of Elmira’s Lead Hazard Reduction Program. Prior to 2019 the Chemung County Health Department kept paper records of lead data; thereafter, the Department created an electronic file that tracks fingerstick results, venous results, which provider office the test came from, what the levels are, the number of admissions each month and totals for all the data entered. The elevated blood level data for tested children will be shared with the City of Elmira via the Building Blocks program and linked to the address of the home in a manner that does not violate HIPAA laws.

The total population of children under the age of 6 for the City is 2,365 (American Community Survey, 2018). Prior to January 2019, it is estimated that each year between 2013 -2017, 1,600 to 1,900 lead tests were performed on children in Chemung County. In each of these years, greater than 10% of those tests were elevated above or equal to 5 mcg/dl. These levels remain elevated year after year. In 2013 through 2015, the rate per 1,000 tested children less than 6 years of age with confirmed lead levels greater than 10ug/dl in Chemung County was 21.2 (NYS rate = 5.1). The most relevant data available prior to January 2019 for the City is from the NYSDOH, in 2014 there were 429 tests, 15% of those tests were between 5mcg/dl – 10 mcg/dl. In 2018, there were 1,764 lead tests reported, 43 tests had blood lead levels over 10, 70% (30) of those were in the targeted zip codes. In 2019 so far (January-June), there were 914 lead tests reported, 20 tests had blood lead levels over 10.

The current number of children between January 2018 and June 2019 who tested with an elevated lead level above 5 for the targeted zip codes is 298, which were all new cases. The data is shared at the bimonthly Chemung County Lead Coalition meeting and will be used to prioritize marketing, targeted education plans, and selection of housing units to recruit for the lead hazard control work under the grant. The goal of the program is to target lead safe housing in the City of Elmira as it includes the highest risk areas within Chemung County. The data reviewed also provides correlations with housing units and landlords to target specific referrals to work with those areas on assessments, practices, and repairs.

A capillary blood lead test will be recommended prior to lead hazard control activities and after LHC work for children under 6, referred to the program because of elevated blood levels. Children less than 6 years of age will be referred to their physician and/or the Chemung County Health Department.

All program partners will be asked to provide program information directly to their clients. Partners will not share client information with the program. Program partners may work with clients and the program to get clients signed up for the program but not without the presence and permission of their client.

### **Health Insurance Portability and Accountability Act of 1996**

HIPAA guidelines will protect the medical information of a lead poisoned child. All medical information, including children's blood lead levels and protected health information, will be maintained by HIPAA trained staff. The City of Elmira will not provide, nor will be the sub-recipient of such medical information in regard to a lead poisoned child in the household. The information is not necessary for the purpose of this project. Follow up medical monitoring maybe completed by the Chemung County Health Department, along with the family's medical provider; however, the City of Elmira will not be involved with this process.

### **Grievances and Appeals Rights and Procedures**

The City of Elmira's Lead Based-Paint Hazard Control Program is prohibited by federal law from discriminating on the basis of race, color, religion, sex, national origin, age, disability, political affiliation, belief or citizenship.

If an applicant feels they have been subjected to discrimination under a program or activity funded by the program, they may file a complaint within thirty (30) days from the alleged violation. All complaints shall be submitted in writing. The person who has an alleged complaint will first meet with the Program Manager to explain the problem and together they shall attempt to resolve the issue informally. If the complaint remains dissatisfied, he/she must file within five (5) days, a written complaint to the Executive Director of the Department of Community Development, requesting an informal conference. The complainant and the Director will discuss the allegations and attempt to resolve the issue informally. The findings of the Executive Director will be submitted to the complainant not later than ten (10) days following the informal conference. If the complainant is not satisfied with the written results from the Executive Director on the informal conference, he/she must so inform the Program Manager within five (5) days and request a separate review overseen by the City Manager to seek resolution of the issue. All involved parties have the right to be accompanied by an attorney or other authorized representative. Also, the involved parties have the right to present testimony and to bring witnesses and records.

A written decision will be issued to the complainant and all interested parties sixty (60) days and will include:

- 1). A synopsis of facts
- 2). A statement of reasons for the decision

### 3). Notification of recourse

If the complainant is still dissatisfied, or a decision is not received within the sixty (60) days of filing the complaint reviewed by one of the following: Office for Civil Rights, U.S. Department of Health and Human Services, Bureau of Civil Rights Compliance Department of Public Welfare, and/or the Civil Rights Commission.

### Applicant Intake

Properties within the City of Elmira, whose owners and/or tenants meet the requirements of program, will be eligible to participate in the program. Community involvement will be an important element in maintaining a successful program and sustained recruitment. The Program Manager will be responsible for monitoring recruitment and partner performance as well as implementation of outreach plans to ensure sustained recruitment. Outreach, education and training will occur throughout the service area.

Families of lead poisoned children will be the first priority and be moved ahead of other projects. Applications will generally be processed on a first come, first served basis. However, when there is a back-log of projects, units will be prioritized in the following order: *1 - units with a poisoned child under the age of six; 2 – units where a child less than six years of age resides; 3 – all other units.*

It is anticipated that, of the 60 units to be completed, approximately 30% will be owner-occupied and 70% rental. The majority is expected to be single-family housing, and 1 and 2-unit housing.

The intake process is expected to take 3 months including the Inspections/Assessments and Procurement. An excel spreadsheet has been created to gather program data and track program process.

### Invoicing

**Drawing and Approving Funds:** The program will follow HUD policy guidance 2015-01 in determining allowable costs. The Finance Director will submit detailed draw requests to the HUD, the week prior to City Council meetings. The Finance Director will process the eLOCCS portion of the draw and Program Manager will submit the draw request into HHMGS. The Finance Director will be responsible for maintain detailed program financial reports and providing detail program activity and status updates to the City.

**How funds will be dispersed to Contractors:** The Department will reimburse the service providers, Contractors on a cost reimbursable basis. The Contractors will submit billing statements on a bi-weekly basis. Only those costs, which are determined to be allowable, allocable, and reasonable in accordance with the cost principles of OMB Circular A-87, and OMB Circular A-122 will be reimbursed. Licensed lead-based paint hazard control work contractors will enter into contracts with the owners of the units scheduled for lead hazard control work. The contractor will be allowed periodic payments, bi-weekly, utilizing request for payment forms. These forms will be submitted to the Program Manager and Finance Director of the Lead-Based Paint Hazard Control Program. All work must be approved by the Finance Director and Program Manager before any payment is made. Absolutely no funding will be advanced to contractor for labor or materials. Twenty percent of payment will be retained until the completion of the work & lead clearance.

**Selection process for contractors:** A pool of qualified contractors shall be created during the startup phase of the grant period. This pool will be established by holding contractor meetings to discuss the grant & project work. Contractors interested in participating will be further screened to determine if they have the appropriate qualifications. If they do not have the appropriate training, they will be invited to participate in on-site training classes.

Contractors shall be added to the pool in the order that completed applications are received and required documentation is verified. As new Contractor applications and required documentation are received, each new Contractor shall be added to the bottom of the list. When a project is ready to be assigned to a Contractor, the Project Manager shall contact the first contractor on the list with the capacity to complete the work within the required timeframe. Work specifications on each unit will be written up and pricing determined from the Standard Component Price List. The Project Manager will review the work specifications with the Contractor as well as the overall price to ensure all components of the project have been quantified.

### **Income Verification Process**

The City of Elmira will determine and verify Household income using the annual income definition as defined in 24 CFR 5/609, commonly referred to as “Part 5 annual income.” Adjusted gross income is defined as gross income minus adjustments to income and as such applicants will be required to submit signed copies of their Federal Income Tax Returns, W-2s and most recent paystubs when submitting the application. Individuals whose incomes fall below the standards to file a Federal Income Tax Return, will have to supply documentation regarding any income they receive. During the application process, applicants will be required to provide documentation as follows:

- Welfare assistance;
- Payments in lieu of earnings, such as unemployment, disability compensation, work’s compensation, and severance pay;
- Periodic and determinable allowances such as alimony and child support and regular contributions or gifts received from organizations or person not residing in the dwelling;
- All regular and special pay, and allowances of members of the Armed Forces (whether or not living in the dwelling) who are the head of the family or spouse;
- Relocation payments;
- If self-employed - two years of tax returns and W2s are required. Prior year’s tax return must be submitted by all applicants who file an application after April 15<sup>th</sup>.
- If Federal Income tax returns are not available, the IRS Letter 1722 will be accepted only for persons who filed a Form 1040 EX or a 1040A (“long form”) you must use IRS Form 4506 to request a copy of the tax return and it normally takes 15 days for the copy of the tax return to be returned to you. Individuals receiving pensions and/or social security and/or other

earnings or periodic payments will be required to submit proof of such payments in a manner satisfactory to the Department of Community Development.

- Last 2 months of all employer check stubs for everyone in the household over the age of 18.
- Social Security Benefits - If you receive social security benefits, please provide a copy of your Award Letter as verification of benefit. You may contact the Social Security Administration office at 1-800-772-1213 to receive a copy of the letter.
- If anyone in the household is receiving child support, please submit documentation such as a divorce decree, Child Support Recovery Unit statement or other proof of support.
- If anyone in the household is receiving unemployment, a statement from the Workforce Development office is required. (We are also able to retrieve this information by submitting the authorization to release information form that you signed).
- If anyone in the household is receiving any other type of income (pension, FIP, rental income, etc.,) you will be required to submit appropriate documentation as well.
- Two months bank statements from all banks and/or lenders that you are affiliated with for everyone in the household over the age of 18 including all retirement accounts (computer printouts are only acceptable if they are an actual copy of the statement).
- Copy of the Homeowner's Insurance policy – TO BE PROVIDED BY LANDLORD IF THIS IS A TENANT APPLICATION

Also included in the application, is a release of information that will allow the program to complete 3<sup>rd</sup> party verifications. Likely 3<sup>rd</sup> party verifications are but not limited to: employer, Social Security Administration, Department of Human Services, and local Housing Authority. The program will use the income verification document review hierarchy as follows: 1. Hard copy third party (in-person, online, or fax) 2. Verbal Third Party documented by the program 3. Tenant/Landlord Declaration 4. Form HUD-50058.

1<sup>st</sup> Option (preferred method): Once all documents and verification are collected, Program Staff will utilize the HUD Income Calculator, to calculate applicant's income. This tool is found at: <https://www.hudexchange.info/incomecalculator>. This tool allows for all household member's to be accounted for as well as input all documentation collected by staff. After inputting all the income information, the tool allows for a printout, which will be placed in the file. Upon calculating the income, Program Staff will use the gross annual income to verify that the household qualifies.

2<sup>nd</sup> Option: Once all documents and verification are collected, Program Staff will utilize an excel spreadsheet to input all aspects of the verified income. This tool allows for all household member's to be accounted for as well as input all documentation collected by staff. After inputting all the income information, the tool allows for a printout, which will be placed in the file. Upon calculating the income, Program Staff will use the gross annual income to verify that the household qualifies. Staff will calculate household's income category based on percentage, this will be documented in the Program File.

### **Unit Eligibility and Client Priority Focus**

The unit eligibility and client priority will be managed by the Program Manager and Program Coordinator. After all minimum criteria are met, units will be prioritized to meet the needs of children with identified elevated blood lead levels; units with children under age 6; and units with women of childbearing age.

- **Owner-Occupied units**, which are the primary resident of the family, must have family income below 80% of Area Median Income. Not less than 90% of the units assisted will be occupied by a child under age 6. So staff will prioritize those units with a child under six years of age who resides or spends a significant amount of time in the unit or a unit where a pregnant women resides. A visiting child who spends significant amount of time is defined as at least three hours per day on two separate days in a week (six hours per week total), and at least 60 hours total per calendar year.
- **Multifamily rental units** (5 units or more) will not be eligible for this program.
- **Rental units/landlords** participating in the program will require that at least 50% of the units' family income be at less than 50% of the Area Median Income. The remaining units must have a family income below 80% of Area Median Income. Property owner must give priority when renting the unit to families with a child under 6 years old for at least 3 years.
- **All zero-bedroom units** must have a child under six must residing, visiting for a significant amount of time, or expected to reside in the unit. "Expected to reside" means there is actual knowledge that a child will reside in a dwelling unit. If a resident woman is known to be pregnant, there is actual knowledge that a child will reside in the dwelling unit.
- **Vacant units** may be eligible for lead-paint hazard control funds if the property owners agree to rent or sell the unit to a family with children under six years of age who qualify as low-income. For rental units, the landlord must also agree to sign a one-year lease with the family with an option for a second year. Additionally, the rental property owner must sign a participation agreement with the City of Elmira agreeing to give priority to families with children under the age of six for not less than three years following the completion of work. The Participation Agreement mandates that rental property owners will adhere to Fair Market Rent values and market units to low-income families with children under the age of six and prohibits discrimination and retaliatory eviction. Rental property owners are required to pay back the total amount of grant funds expended if they fail to meet program requirements for at least 3 years following completion of lead hazard control work (e.g. fair market rent values, renting to very-low or low-income families, and giving priority to families with children under age 6. Additionally, the vacant units must be rented or sold within six months of receiving funds, or the property owner must repay the funds to the City of Elmira. The City of Elmira will allow no more than 10% of the total number of units (60) to be vacant with the exception of units that become vacant due to a lead order. Those units will be considered occupied as they were up until the point that the Chemung County Health Department deemed them unsafe for occupancy. Once vacant units are rented, the landlord will be required to report that the unit has been rented and income eligibility.
- **Landlords** will be eligible for grant funding for up to four rental units per grant cycle. Property owners are eligible for grant funds for remediation work on a maximum of four units; after which point, property owners can utilize a low interest loan for remediation work on subsequent units.

The City of Elmira will maintain a web-based Lead Safe Housing Registry that is designed to enhance program effectiveness by listing units made lead safe. These units will be made available to income qualified families for no less than three years after receiving lead hazard control assistance through the

grant program. The grant program will further fair housing by ensuring that all completed rental units will remain affordable and be marketed to priority populations for a minimum of 36 months following program activities.

The unit must have been built prior to 1978. The Property Tax payment and homeowner's insurance must be current.

### **Lien and Participation Agreement**

A lien and restrictive covenant will be executed with every multi-family or rental property receiving grant funds. Upon occurrence of any of the following events during the three-year long 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: (1) Transfer or conveyance of the real estate by deed, land contract, lease, or otherwise, during the Affordability Period; (2) Commencement of foreclosure proceedings by any mortgagee (or deed in lieu of foreclosure), within the Affordability Period; (3) Units not being used as a residence by a qualifying tenant or not leased according to the grant Participation Agreement. The award recipient must execute and record a lien and restrictive covenant prepared by the City of Elmira.

### **Financial Assistance Property-Owner Guidance**

Grants with a ceiling of \$15,000.00 of lead hazard control funds will be available to owner-occupants and rental units for lead-based paint hazard control work. Within the City of Elmira Historic Districts, grants with a ceiling of \$20,000.00 will be available based on lead remediation costs being higher for historic rehab work. The eligible income level for these grants is at or below the 50-80% level of the median income, based on household size. If the total family income falls at or below the 50-80% level, the applicant will be eligible for a grant up to \$15,000.00 for the actual cost of the lead hazard control work. Additionally, units will be eligible for up to \$5,000 in home-repair funds that prioritize health and wellness related property repairs.

All owner-occupants would have to meet/agree to the following stipulations: 1) the assisted unit must be the principal resident of the family; 2) the property taxes on the unit assisted must be either paid up-to-date or if in arrears no more than three years. If in arrears, arrangements must be made with the County Treasurer's Office for a tax payment schedule; 3) the owner-occupant will have to comply with the lead hazard control strategy.

If a landlord owns and/or controls four or less rental units, the following will apply: A match of 10% of the total project cost of the lead hazard control work will be utilized for landlords whose units are occupied by tenants with income levels at or below 80% of the area median income level. The match is based on a ceiling of \$15,000 per unit (Lead Hazard Control) with an additional \$5,000 per unit in Healthy Home funding that is also available. The Lead Hazard Control Program may on a case-by-case basis, provide 0% loans to landlords, whose personal income is at or below 80% of the median income level, for their 10% matching share. This loan would be payable in full, when the property is sold or transferred.

If a landlord owns more than four units (this would include being involved in a corporation, which owns property), the following will apply: 1) the first four units would come under the guidelines for four or less units. A corporation will be treated as a landlord with an income level above the 80% level of the

median income; 2) if a fifth or more unit is assisted, a 3% interest rate loan will be utilized for landlords whose units are occupied by tenants whose income levels are eligible. The maximum amount of the loan is \$15,000 per unit. This loan would be payable by monthly payments for a period of ten years. (3) All landlords must meet the following stipulations: a) the landlord must not raise the rent over the HUD fair market rate after the lead hazard control process has been completed and accepted; b) the landlord must give priority in renting units that are assisted, to families at or below the 80% level of the median income, and have a child under the age of six years living in the household. This priority would be for a period of not less than three years following completion of lead hazard control activities; c) the landlord must offer a one-year lease to the tenant(s) of any assisted unit. However, the tenant may choose not to accept this offer; d) a landlord must not terminate the tenancy of a tenant of rental housing assisted with Lead-Based Paint Hazard Control Funds except for serious or repeated violation of the term and conditions of the lease; for violation of applicable Federal, State, or local law; or for other good cause; e) the property taxes on the unit(s) assisted must be paid up-to-date; f) the landlord's match money will be used first (before any Lead-Based Paint Hazard Control Funds) to pay for the hazard control work; g) the landlord will have to comply with the lead hazard control strategy established by the City of Elmira.

**The Program will be administered and monitored** by the Department of Community Development. The operational procedures will include the following components:

- 1) Application for grant, loan or matching funds the applicant will first complete a questionnaire form. The program guidelines and financial assistance will be reviewed and explained to the applicant. The applicant will then be given a packet of information containing guidelines, grievance procedures, and information on the dangers of lead-based paint. The applicant will sign a form acknowledging receipt of packet and will complete and sign all necessary verification forms.
- 2) Verification and work preparation - the staff will send out verification forms, verify ownership of property, inspect houses and write specifications. The owner must then approve the specifications. A written estimate of the lead hazard control costs and supplemental healthy home repair will be made and the bid package will be prepared.
- 3) Continuing administrative functions- staff will record applicant and contractor EEO information, maintain case records for all loans and grants, complete periodic status reports on all active cases, and keep a log on each contractor as to number of current jobs, satisfactorily completed jobs, complaints, resolution of complaints, and performance within allowed time period. Also, separate relocation files will be maintained for each applicant documenting his/her relocation.
- 4) Contractor Registration- Each contractor must have on file a completed contractor's questionnaire and, submitted proof of liability insurance and workers' compensation. In addition, proof of licensure by the EPA for lead hazard control work must be on file. The Lead Program will establish a lead-based paint contractors pool, the training of rehab contractors who do rehabilitation for other agencies.
- 5) Contractor Selection- Contractors shall be added to the pool in the order that completed applications are received and required documentation is verified. As new Contractor applications and required documentation are received, each new Contractor shall be added to the bottom of the list. When a project is ready to be assigned to a Contractor, the Project Manager shall contact the first contractor on the list with the capacity to complete the work within the required timeframe. Work specifications on each unit will be written up and pricing determined from the Standard Component Price List. The Project Manager will review the work specifications with the Contractor as well as the overall price to ensure all components of the

project have been quantified. Please note that a contractor awarded a lead hazard control job must be licensed by the EPA and EPA Firm Certified and must follow all HUD, OSHA and EPA Guidelines. The City of Elmira will provide assistance in order to prepare contractors for the additional training required.

- 6) Project acceptance- the staff will notify contractors that they have the opportunity to start a new project. When a project is ready to be assigned to a contractor, the Project Manager shall contact the first contractor on the list with the capacity to complete the work within the required timeframes. Contractors may review the specifications and walk through the property with the inspector from the City of Elmira. The contractor must either accept or reject the job within three business days or the job shall be offered to the next contractor on the list. Once they have accepted the job, the Project Manager shall coordinate with all other parties so that contracts can be signed within one week. Work shall begin within 15 days of the contractor signing the contract unless otherwise arranged. The next available job shall then be offered to the next contractor on the list with the capacity to do the work, and so on. Once the end of the list has been reached, the next job goes to the first contractor on the list again. Contractors are encouraged to turn down a job if they do not have sufficient capacity to complete it within required timeframes, as they will be held responsible (per contract) if deadlines are not met. Contractors may work on more than one job concurrently, provided they are the next available contractor on the list, and they have sufficient capacity to complete all interior/exterior work within 10 business days per dwelling unit.
- 7) Processing of funds- A purchase order will be completed and approved for the lead hazard control work for each housing unit.
- 8) Grant or loan settlement-. Mortgage papers, promissory note, certificate of assistance will be signed by the applicant. Both the contractor and the owner must sign the lead hazard control agreement. A proceed-to-work order will then be issued.
- 9) Construction work- no change orders will be valid unless approved by the Program Manager, Finance Director, and/or other contracting officials. Estimate for additional work must be done independently of the contractor and prior to any approved change order. Staff will conduct periodic inspections of contractor's lead hazard control work, including the setting up of containment, certifying that at final cleaning the affected areas are free of dust and debris and ready for clearance testing. The Finance Director will approve payment all work that is completed in a professional and timely manner, and according to the standards set out in the specifications. All necessary zoning and building permits must be submitted before a proceed-to-work order will be issued.
- 10) Project Completion - the staff will conduct final inspections of all completed work and obtain owner's signature on final inspection form. Also, obtained will be a letter of guarantee from contractor. Before payment is made to contractor, the owner must sign a certification of satisfaction. The staff will then send the owner a closing packet.
- 11) Closing case file - A Closing Packet will be created when the lead hazard control work is completed on a unit. The Closing Packet includes the following items: a copy of the lead inspection/risk assessment; a copy of the Certificate of Post-Abatement Clearance; a copy of the specifications; a copy of the Contractors Report; and a copy of the On-Going Monitoring and Maintenance Acknowledgement Form.

### **Lead Inspection and Risk Assessment**

All State and Federal standards for a combined lead paint inspection/risk assessment and remediation will be followed. All lead inspections will be performed by the Community Development Program Manager and a field inspector from Ecospect who is a licensed Lead Based

Paint Specialist – Manager, EPA Certified Lead Paint Risk Assessor, EPA Certified Radon Mitigation Specialist and NYS Licensed Home Inspector. Inspections must be done using an XRF analyzer. XRF readings of greater than 1.0 mg/cm<sup>2</sup> are considered positive; if an XRF inspection is not possible or appropriate, laboratory analysis may be used (0.5% by weight for paint chips). Inspection costs are figured into staff costs and hours for the program. HUD policy guidance 2017-01 Rev, 2013--01 and 2012 HUD guidelines chapters 5, 7 and appropriate chapters will be followed.

### **Dust Samples**

Dust samples will follow the following HUD defined thresholds, unless the State of New York employs stricter guidelines:

New Dust-Lead Action Levels:

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

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

New Lead Clearance Action Levels:

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

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

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

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

### **Scope of Design**

The Program Manager will be responsible for developing the work specifications for each project. Work specifications are based on the nature and severity of lead hazards identified in the inspection/risk assessment reports, the cost to address the hazards, maintenance, use of the components and likelihood of exposure to a child under the age of 6. Per IA Statutes a lead hazard is defined as: the presence of lead base substances greater than 1.0 mg/cm<sup>2</sup> on chewable, accessible, horizontal surfaces that that a young child can mouth or chew; lead base substances greater than 1.0 mg/cm<sup>2</sup> which are peeling, chipping, chalking, or cracking or any paint located on an interior or exterior surface or fixture that is damaged or deteriorated and is likely to become accessible to a child; lead base substances greater than 1.0 mg/cm<sup>2</sup> on interior or exterior surfaces that are subject to abrasion or friction or subject to damage by repeated impact; or bare soil in play areas or the rest of the yard that contains lead in concentrations equal to or greater than 400 parts per million of lead in bare soil in child's play areas. The program will follow all U.S. Department of Housing and Urban Development and Chapter 70 of the State of Code regarding lead paint requirements and when a discrepancy is found between the two the most stringent policy will be followed.

All persons performing LHC work must be properly licensed/certified. Documentation for each project shall be submitted to the program prior to the contract being awarded. Overall responsibility to ensure integrity of this process falls to the Program Manager.

The Program Manager will notify the licensed abatement contractor that is first on the pre-qualified list, via e-mail & by phone of the date of the scheduled walk-through. In-house cost estimates utilizing the Standard Component Price List & the report produced by Ecospect will ensure that the overall costs are accurate and within an acceptable range. The pre-construction walk through with the contractor shall go over the report provided by Ecospect & the in house estimate to ensure that the project will go smoothly.

### **Document Review**

The following documents will be submitted to the Program GTR upon document creation and during the time updates and modifications are made:

- a) Authorizing Official and other Key Personnel
- b) Budget Allocation including revisions to Match Commitment
- c) Period of Performance
- d) Work Plans or Benchmarks
- e) Target Area
- f) Other Significant or Administrative Change

### **Clearances**

The scope of work, based on the inspection/risk assessment, will generally apply a combination of interim controls and abatement. For surfaces considered the most hazardous, abatement will be considered including replacement (windows), wet paint scraping and enclosure methods.

Dust containment is specified, including using polyethylene sheeting on floors and as barriers to isolate work areas. Worker protection consists of using respirators, wearing disposable clothing, and following basic personal hygiene practices. Clean-up using cleaning solutions and HEPA vacuums will be required.

A clearance inspection conducted by licensed inspector Ecospect is required following completion of lead hazard reduction activities on the interior or exterior of a dwelling. Clearance procedures outlined in the Administrative Code Chapter 70 shall be followed. Dust wipe final clearance levels cannot exceed 10, 100 and 100  $\mu\text{g}/\text{ft}^2$  for floors, windowsills and window troughs, respectively.

### **Environmental Review**

The Tier I ERR and RROF and Tier II will be completed by the Program Manager, with assistance from the Lead Coordinator. Using the "Appendix A" provided by HUD, individual properties will be evaluated for compliance with historic and floodplain issues. Consultation with the State Historic Preservation Office (SHPO) of New York, will be conducted and the Program will follow their prescribed policies. Properties that are located in the 100 year floodplain will be required to maintain flood insurance.

### **Post Clearance Monitoring**

All property owners will be given information on which lead hazard control activities conducted in the unit will need ongoing monitoring. A tool will be created that identifies a timeline for conducting monitoring, person responsible for monitoring, and detail on how the monitoring should be conducted. At the time of property clearance, a healthy homes reevaluation will be conducted.

This information will along with the post clearance monitoring will be given to the property owner at the time of property owner-project sign-off.

### **Community Outreach and Education**

The Department of Community Development will work closely with the Chemung County Lead Coalition. The Lead Coalition was formed to assess the community's need to prevent lead poisoning by identifying problems and developing prevention and intervention strategies to decrease the incidence of lead poisoning in Chemung County. The members will provide technical assistance in the areas of healthcare, housing, lead hazard control, legal issues, education, construction, rehabilitation, weatherization, social skills, parents' issues, political issues, financial issues, liability, insurance, research and development, and outreach efforts including public awareness campaigns. The Department of Community Development and the Chemung County Lead Coalition will be responsible for ensuring that education; outreach and Community awareness efforts are implemented.

**Outreach efforts** to involve participants will utilize a variety of approaches in order to reach the largest audience possible. The outreach effort will identify and utilize local resources such as the lead program staff, community groups and agencies, elements of city and county government, and the local college for performing outreach functions. Notices will be placed in places of employment, unemployment offices, welfare offices, post offices, grocery stores, churches, community halls, city and county offices and utility companies. News stories informing the public about the lead program will be published in daily and weekly newspapers and other local publications. Public service announcements regarding the Lead Program will be made by local radio and television stations.

Outreach will be conducted by Program staff and partners. Program partners have been selected because of their ability to reach a large number of children under the age of six, low-income and disabled individuals. Program staff will have the overall responsibility to ensure the Program is being marketed to eligible parties. These materials include the program brochure, the application, including tenant qualification packet and relocation plan-determination.

Lead-based paint standard maintenance practice workshops will be held over the life of the grant. A sample of topics are: developing a custom fit checklist to conduct lead-based paint maintenance activities in a safe manner; basic information on proper and improper lead hazard control work practices; "work smart" "work clean" "work wet" and "work safe"; and the new EPA Pre-Renovation Information Rule. With these and other workshops scheduled for renovators and remodelers, Landlord Associations, Section 8 Landlords and others; lead-safe work practices can be integrated into their ongoing maintenance of housing units. Classes for lead licensed workers, lead licensed contractor/supervisor classes, and classes for Lead Inspector/Risk Assessor are planned during the first six-months of the grant.

**The Lead Hazards will be eliminated in at least sixty (60) housing units.** Each housing unit will receive a combination of interim controls and abatement techniques. The overall goals of the strategy are 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 owners and occupants on lead safety and in-place management of lead hazards, particularly regarding the slowing and cleaning

of recontamination.

**To ensure that lead-safe units remain affordable** by requiring landlords to agree to a set of stipulations that include the requirement that the landlord must not raise the rent by more than 3% per year for a period of three years and to give priority to renting to low to very-low income families who have children under six years of age living in the household. This three-year period will not begin until the hazard control process has been completed and accepted.

### Relocation

The tenant relocation plan states that consistent with the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, the Uniform Relocation Act Amendment of 1987 and the Department of Housing and Urban Development rules and regulations, persons involuntarily displaced as a result of federally funded projects and programs will not suffer disproportionate injuries as a result of this program. To implement this policy, Community Development has developed a plan to ensure that relocation payments and services are made available to persons requiring either temporary relocation or who will be permanently displaced.

Temporary relocation of tenants is generally recommended when work is undertaken that will disturb painted surfaces known or suspected to contain lead-based paint and the work will occur throughout much of the dwelling over several days. (If the work does not disturb lead-based paint, dust-lead hazards or soil lead hazards, relocation is usually not necessary as a lead-exposure protection measure.) Temporary relocation is clearly necessary if residents cannot have safe access to bathrooms, sleeping areas, and kitchen facilities (or alternative eating arrangements) during non-work hours. Safe access includes the absence of other significant safety, health, or environmental hazards in addition to lead hazards (e.g., toxic fumes, on-site disposal of hazardous waste, or exposed electrical wiring).

Staff will explore the various options available to the occupant, based upon needs expressed and expenses that will be incurred. The Program Manager will make the final arrangements once the start date of the project is determined. No eligible person is denied access to relocation services, and agreement for payment of eligible costs is based upon services performed in accordance with adequate documentation for actual costs incurred.

There are, however, several exceptions and options that may be considered in deciding whether it is necessary for residents to temporarily relocate and, if so, for how long and whether furniture and other belongings must be moved. The homeowner/occupant is responsible for moving and storage of all valuables. The relocation staff does assist with an inventory checklist of all household valuables not placed in storage. The Contractor provides polyethylene coverage for all objects or furniture not moved by the occupants.

This procedure was established to ensure that everyone is treated fairly and equitably. The relocation plan envisions a short-term, temporary displacement of residents. The time frames to complete lead hazard control work using a combination of interim control measures and abatement techniques is projected to be 5 to 14 calendar days. Temporary housing will be secured for tenants and for owner/occupants. This method will be used for short-term relocation needs.

Once the lead hazard control activities are completed along with any interior rehabilitation work, the program's Licensed Risk Assessor from Ecospec will perform a visual inspection and take clearance

samples as prescribed by federal and state guidelines and regulations. An independent, NLLAP approved laboratory analyzes the dust samples and provides a 24-hour verbal analysis of the results to the Program Manager. If the clearance standards are met, occupants are allowed to return to the unit.

An occupant project plan will be developed to provide the occupants the upmost safety from lead-based paint exposure while work is being conducted in their place of residence. The plan will look at the following to determine the best plan of action for the occupants while lead-based paint work is being done:

### **Work Is a Small Area**

If only a small amount of paint is being disturbed, that is, an amount below HUD's *de minimis* threshold for HUD-assisted projects, or EPA's minor repair and maintenance work threshold for unassisted projects, special measures to protect residents from exposure to leaded dust are not required (see Section II.A, above, for a definition of the HUD and EPA area threshold definitions).

However, basic precautions are strongly recommended. These include: never using prohibited paint-removal practices (see Chapter 11, Section II.D.1), and cleaning the work area thoroughly after work is completed. Also, if a child under age 6 resides in or accesses the unit or area, keep residents out of the work area until after final cleanup.

### **Work Is Only on the Outside**

Residents and their belongings may remain inside the dwelling if the work is only on the exterior and building openings (windows, doors, vents) within 20 feet of disturbed paint surfaces are tightly closed or sealed and cleaned afterward, *and* an entryway is provided that is free of dust-lead hazards, soil-lead hazards, and debris.

### **Work and Clearance Take Only One Day**

If the work, final cleanup, and clearance can be achieved (i.e., results of dust sampling received from the laboratory and found to be acceptable) in one work day, residents need to be out of the work area or the unit only for that day and can return with full access to the unit at the end of the day. As a practical matter, however, completion of the work and achievement of clearance in one day may not be a realistic goal. It usually takes an additional day to get the results of the laboratory analysis. However, as discussed in Unit IV.E, below, methods (including portable X-ray fluorescence (XRF) analysis and anodic stripping voltammetry) exist for reliably analyzing wipe samples on-site instead of in a fixed laboratory, which may provide testing results much more quickly than fixed-laboratory analysis by avoiding transportation of the samples to the laboratory and handling time within the laboratory. A laboratory that is recognized under NLLAP for mobile source lead dust analysis may be used for clearance. This approach may be particularly helpful for multi-family projects, in which a work crew may be working on a unit while the clearance test analysis is being performed on the crew's preceding unit. Sometimes work areas do not pass clearance the first time, so recleaning and additional dust sampling is required, which may require an additional day, even if the dust-lead analysis is rapid.

### **Work Area Is Limited and Work Is of Short Duration**

Relocation is usually not necessary or is necessary only for workday hours if the work: takes less than five days; is being conducted in only one or two rooms; and if exclusion from those rooms does not preclude safe resident ingress and egress to the unit and safe access to kitchen (or alternative eating arrangements), bathroom, and sleeping areas. Furniture and other belongings can be moved out of the workrooms or covered and sealed with protective sheeting and tape. It is recommended, however, that

residents who remain in their units or vacate only during workday hours while such limited area work is being conducted be required to sign a statement that: (1) they understand that there may be lead-based paint hazards in both specified work areas and traffic areas used by workers outside the work areas in spite of a thorough cleaning of such areas; and (2) they agree not to enter the work areas until they are notified by a specified responsible party that the areas have passed clearance (or cleaning verification, if applicable). Theoretically, such arrangements, in which residents remain in the unit or are absent during the workday but return for the night, can continue for an extended period of time. As a practical matter, however, there are limits to how long people will comply with such procedures. HUD regulations pertaining to housing receiving Federal assistance for the residents to live there or for the work allow this type of arrangement to continue for no more than five calendar days (24 CFR 35.1345(a)(2)(iv)). If residents are to be allowed back in the unit during the night, it is necessary that workers thoroughly clean, at the end of each work day, not only the work areas but also the floors of the pathways used by workers to and from the work areas. Installing protective sheeting on these pathways facilitates cleaning. If a decontamination area is used in a large multifamily project, cleaning is necessary only from the work areas to the decontamination area.

### **Exception for Elderly Residents**

Because of the added difficulties that may accompany the relocation of elderly residents, it is acceptable to make special exceptions to normal relocation policy for them. This exception is acceptable for work to be done in housing for the elderly. (As stated in the Lead Safe Housing Rule, housing for the elderly means retirement communities or similar types of housing reserved for households composed of one or more persons 62 years of age or more, or other age if recognized as elderly by a specific Federal housing assistance program; it is not merely housing occupied by the elderly.) If elderly residents are permitted to stay in their units when temporary relocation would normally be required, they should be fully informed about the lead abatement project.

### **B. What Relocation Units Are Acceptable?**

Relocation dwellings should be acceptable to residents so that they will not attempt to return to their own dwellings during paint-disturbing work. Generally, dwellings serving as temporary relocation units should, at minimum, meet applicable housing codes. If they are HUD-assisted, they should meet the regulatory standards, e.g., housing quality standards (24 CFR 982.401) or physical condition standards (24 CFR 5.703). If they were constructed before 1978 and are not HUD-assisted, they should also pass a visual assessment; that is, they should have no deteriorated paint and no visible dust or debris. In addition, these units should be adequately equipped with furniture, cooking facilities, refrigerators, televisions, and toys (except for items that will be moved with the residents).

Relocation is usually a substantial undertaking, involving not only the movement of people and their possessions, but also the coordination of mail, phone, school, and community changes. Whenever possible, children should continue to attend the same school during the relocation period, even though this may involve finding special transportation. Due to their complex nature, relocation considerations may dictate the scheduling of the project. Destination options include staying with relatives or friends, a designated relocation unit owned or leased by a local organization, a hotel or motel (usually the costliest and least desirable option for families with children), or a temporarily vacant unit in the same multifamily property. If the Lead Safe Housing Rule requires relocation of the family to a temporary unit during work, the unit to which the family is relocated must not have lead-based paint hazards (24 CFR 35.1345(a)(2)).

### **Who Should Pay?**

If relocation of tenants is required as a result of an activity assisted by the Federal Government, the requirements of the Uniform Relocation Act (formally, the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (42 U.S.C. § 4601 et seq.) and its implementing regulations at 49 CFR Part 24, may be triggered ([www.hud.gov/offices/cpd/library/relocation/index.cfm](http://www.hud.gov/offices/cpd/library/relocation/index.cfm)). Relocation is usually considered to be part of the cost of lead hazard control. In order to maximize the utilization of funding, the relocation is a tiered approach system in terms of funding support.

The Program Manager will determine, based upon the Scope of Work, if relocation of tenants is needed during the lead hazard reduction work. A child with an elevated blood levels (EBLL) and his/her family must be relocated for the duration of the project. Any residence to which a family with an EBLL relocates must first be inspected to ensure the property is lead-safe. When possible, the property owner will relocate the family to another unit they own that is both vacant and lead-safe. If the property owner does not own an additional unit(s), the family will be asked to stay with friends or family members. Relocation to a hotel is the last option. The property owner is responsible for securing adequate storage for the tenant(s) personal property. The Program will assist with motel vouchers, based on a Tier review process.

Relocation Priorities	Responsible Party
Tier 1	Property owners provide tenants another lead-safe unit they own that is both vacant and lead-safe.
Tier 2	If the property owners do not have other lead-safe units, the tenants will be asked to stay with friends or family members, if this option is available.
Tier 3	If the property owners do not have other lead-safe units, then the program will pay for the hotel stay during the lead-based paint hazard reduction construction time period.
Tier 4	If a child's BLL is equal to or greater than 45 µg/dL, the program will provide the relocation for the tenants.

### **How Can Costs Be Minimized?**

One approach to minimizing relocation costs is to reduce the time period of temporary relocation. It may be possible to streamline the work so it proceeds quickly, especially if contractors are offered financial incentives to do so. Also, in some circumstances, it may be possible to stage the work, as discussed above, so residents can return before nonhazardous renovation is finished. Another approach is to minimize specific relocation costs by taking competitive bids or negotiating favorable rates for rental units for relocation, and costs of

### **Communicating with Residents**

The Department of Community Development staff will make arrangements to conduct a home visit to provide the occupants, the initial information regarding lead hazard control activities that have been

selected for the structure. The staff also provides information on blood lead testing, nutrition, the process involving relocation, fair housing counseling and the basic information about food, transportation, busing of school age children, and pets.

Clear and documented communication with residents about the many details of relocation will facilitate a smoothly operating program. Administering organizations should establish policies, procedures, and assigned responsibilities to maximize efficiency of temporary relocation and assure that all program participants are treated in a consistent manner. Among the subjects that should be covered with residents are:

- The need for and importance of temporarily relocating to protect the health of residents and their children.
- The fact that residents must stay out of the work areas until permitted to return, and how that permission will be handled.
- Approximately how long the relocation will last, and how delays in allowing residents to return to their dwellings will be handled.
- The standards for the relocation unit, who is responsible for identifying it, and how that will be done.
- Detailed procedures for handling relocation, including such matters as packing, moving, storage, and caring for personal belongings, utilities, mail, security of the temporarily vacant unit, care for pets, and any special transportation needs (such as to and from school).
- What costs will be paid by the administering organization, limits on certain costs, and method of payment.
- The residents' responsibility not to damage the relocation unit.

These policies and procedures will be put into writing, and the residents will indicate their agreement by signing such documents. These policies and procedures should be made available to meet the needs of all residents including persons with limited English proficiency.

### **Cleaning, Moving and Storage**

Occupants will need to clean and move all personal items in the home that are in the rooms where repair work will be done. This has to be done so that lead dust on them while the Contractor is doing the repairs, and so that the Contractor has room to work. Occupant should clean and move all these things before the date that the Contractor is scheduled to begin. It is very important that items are cleaned before placed back in so that the lead dust is not brought back into the house after the repair work is done.

**In all the rooms where work will be done the floors and walls must be clear. For example, the occupant must remove:**

- Curtains, draperies, window blinds
- All wall hangings [mirrors, picture frames, etc...]
- Fold and remove all throw rugs, runner and mats
- Toys and sports equipment
- Clothing and shoes from closet floors (if closet area will be touched)
- Knick-knacks and other items from shelves and mantels
- All plants

- All pets

Pets cannot be in the home while the Contractors are working, and no pets will be allowed in the alternative site. We encourage residents to plan for pets to stay with family or friends. If that is not possible, then a local kennel may be an option. The resident is responsible for all pet costs.

If work will be done in the kitchen, no dishes, pots or pans can be in the sink and everything from the countertops must be removed. Anything breakable should be cleaned and wrapped in newspaper, towels or clothes before packing them, and the boxes marked “fragile.” Suggestions for packing boxes or bags:

- Label each box or bag by room.
- Tape the boxes or bags shut and make sure that they stack easily.
- Pack and store your things compactly.
- Don’t pack boxes or bags so they are too heavy to lift.

Things that are too difficult to move out of the room completely, can be moved to the middle of the room. They will be covered with plastic and sealed with duct tape to keep out lead dust and other debris by the Contractor. It is very important that residents move all as much as possible completely out of the room so the Contractor has room to move around safely and eliminate lead dust on furniture.

To help keep your things safe, the resident should make a list of everything that will be left in the home while gone. The program, contractor, grantees are not responsible for any lost, stolen, or broken items. Even though the Contractor will lock the home, do not leave valuables in the house. Valuables might include: jewelry, coins, furs, etc., or anything else that may have money or sentimental value. If the resident will be gone for up to two weeks, we recommended that all food be removed from the refrigerator in case of a power outage or if the Contractor needs to unplug it to do the work.

In addition to cleaning the items, the resident must also clean the house so the Contractor can start with a clean space. Carpets, furniture, and drapes need to be vacuumed, and floors, shelves and window sills should be dusted with a wet cloth.

**Staff will meet with the residents**, well in advance of any anticipated move, so that any special needs can be documented and provided for in the relocation process. An individual relocation case file will be maintained for each family that is required to move. Also, the program will ensure that the temporary housing is decent, safe and sanitary, and lead-safe.

**The procedure for post hazard control** involves an On-going Monitoring and Maintenance Acknowledgement Form which informs the owner(s) of the need for on-going monitoring of the completed lead hazard control work and of the known leaded components which are presently intact. In addition, the owners are informed that it is their responsibility to monitor and maintain leaded components in order to keep the housing unit lead safe. Periodic dust wipe testing for floors, windowsills, and window troughs will be conducted to ensure that the unit continues to be lead-safe.

As this is the first Lead-Based Paint Hazard Reduction Grant for the City a contractor pool needs to be developed. Program staff will develop a contractor application, which will be distributed to contractors that reside nearby on the Workforce Developments contractor registration list as well as contractors that are listed on the Department of Public Health’s lead certified abatement contractors. If response is low then applications will be sent State wide. Applications will also be distributed regularly by staff by various means, including advertising, training providers, meet with trade

associations, speaking engagements and through word-of-mouth. The application asks if lead abatement contractor and/or worker training is needed, this information will be used to set-up contractor training. All applicants will be verified in Sam.gov and sent to HUD for eligibility.

### Program Evaluation

**Specific methods will be used to measure progress** and evaluate the program's overall effectiveness. Data will be collected by program personnel and documented on appropriate forms, and other supplemental forms as needed. Appropriate lead testing will be done baseline (before the intervention), for clearance (after the intervention). Information on appropriate forms will be reported to the evaluator. Data will be collected on the dwelling units, buildings and occupants affected by the program; on the results and costs of the hazard evaluation and control; and on any re-evaluation and subsequent control actions.

**Outcome measures** which will be assessed as part of this evaluation are lead dust levels, lead paint samples, lead soil tests, and blood levels of children under 6 years of age, screened in accordance with Centers for Disease Control criteria. Decrements in the quantity of lead for these measures will be calculated for homes where a combination of interim controls and abatement techniques were completed.

### Timeline and Projected Outcomes

We have established the following time table so we can complete the projected 60 units in three years.

<b>Units Assessed</b>			<b>Units Complete</b>	
Q1 (A)	0		Q1 (U)	0
Q2 (A)	4		Q2 (U)	3
Q3 (A)	10		Q3 (U)	8
Q4 (A)	16		Q4 (U)	12
Q5 (A)	18		Q5 (U)	14
Q6 (A)	23		Q6 (U)	20
Q7 (A)	29		Q7 (U)	27
Q8 (A)	34		Q8 (U)	32
Q9 (A)	37		Q9 (U)	35
Q10 (A)	43		Q10 (U)	42
Q11 (A)	50		Q11 (U)	49
Q12 (A)	56		Q12 (U)	53
Q13 (A)	63		Q13 (U)	56
Q14 (A)	65		Q14 (U)	60
Q15 (A)	65		Q15 (U)	60
Q16 (A)	65		Q16 (U)	60
Q17 (A)	65		Q17 (U)	60

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Q18 (A)	65		Q18 (U)	60
Q19 (A)	65		Q19 (U)	60
Q20 (A)	65		Q20 (U)	60