



August 14, 2017

To: HUD CoC grantees and subrecipients

From: Meredith McCoy, WI BOS

RE: Lead-Based Paint HUD requirements

We've recently been made aware of additional requirements for lead-based paint compliance from HUD. The following is a list of requirements that we want to make sure all COC funded projects are adhering to. As this is a HUD requirement, I will be adding this to the monitoring review process.

1. Visual assessments for deteriorated paint and/or risk assessments in all units covered by the Lead Safe Housing Rule. This visual assessment may have been a part of HQS training. If not, there is a resource for training on conducting the visual assessment in the guide that has been created. [24 CFR 35.1215(a)]
2. Projects should be evaluated for applicability of the Lead Safe Housing Rule and the exemption to this rule. [24CFR 35.115 and 35.1200(b)] Participant files need to have a form listing the exemptions and if the unit qualifies for the exemptions. All current units should contain this document and going forward, please use the form created by WI BOS for all units being assisted with COC funds.
3. Participants are receiving Lead Hazard Information before entering a rental unit. Participant files need to contain a signature and date from the participant acknowledging they've received and understand this information. [24 CFR 35.1210(b)]
4. Agencies should be working with the local health department(s) in working together to assist children under the age of 6 with an identified environmental intervention blood lead level. [24 CFR 35.1225] This includes created a formalized process to obtain names and addresses of identified children from the public health department on a quarterly basis. Grantees will also need to report back the health department on a quarterly basis with names and addresses of those receiving COC funding. Public health departments can choose to not receive this list from agencies and a letter stating such must be obtained and kept on file.
If names and addresses are obtained between both parties, information must be matched and if a match occurs grantees will carry out all of the requirements of 24 CFR 35.1225.
This procedure must be included in the agency's COC program policies and procedures manual.
5. To ensure lead based paint requirements are incorporated, written policies and procedures must be updated.

If you have any questions regarding lead-based paint compliance, please feel free to contact me and I will assist in any way that I can.

Thank you,

A handwritten signature in black ink, appearing to read "M. McCoy", is written over the typed name.

Meredith McCoy
Monitoring and Compliance Coordinator
Wisconsin Balance of State CoC