

COMMUNITY DEVELOPMENT

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Work Plan

Narratives:

Program Management and Capacity Building including data collection and program evaluation:

The Rockland County Office of Community Development’s Lead Hazard Control and Healthy Homes Program (the “Program”) utilizes a United States Department of Housing and Urban Development (HUD) Office of Lead Hazard Control and Healthy Homes (OLHCHH) Lead Hazard Control Grant with a Healthy Homes Supplement to assist owner-occupant and rental property owners in performing lead hazard control activities on hazardous lead-painted surfaces in privately owned pre-1978 construction properties, prioritizing units with a child under the age of six (6). The Program is managed by the Rockland County Office of Community Development (RCOCD). The Program will include the following staff: Project Director, Program Manager, Fiscal Officer, Program Assistant, Housing Rehabilitation Field Specialist, Authorized Official, and two (2) Public Health Sanitarians.

Program Manager (PM): The Program Manager is responsible for developing scopes of work, coordinating with contractors, reviewing LIRA reports, traveling to the units to conduct on-site monitoring of contractors, completing Healthy Homes inspections in units that will be assisted, conducting quality control inspections on units inspected by other inspectors, and providing final approval on work completed on eligible units prior to payment. PM will also assist the Project Director with completing the required HUD reporting. PM will also conduct outreach when necessary to expand the pool of contractors working with this grant. This position has a 40-hour work week. (Direct 80%; Admin 15%; Other 5%)

Project Director (PD): The Project Director is responsible for decision-making related to grant policies, procedures, and budgets. The PD will also prepare and review HUD-required reports. As RCOCD is a small office, the PD will have additional direct responsibilities, including intake, processing, and approval of applications, preparing documents to be signed by occupants, working with occupants to arrange relocation when necessary, and determining stipend eligibility of relocated tenants. It is anticipated that these activities will take the majority of the PD’s time. PD will coordinate with non-profit agencies to increase awareness of the Program in underserved communities. This position has a 35-hour work week. (Direct 40%; Admin 50%; Other 10%)

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Fiscal Officer (FO): The Fiscal Officer will manage payments for subrecipients, process draws from eLOCCS, prepare financial reports, and ensure that proper documentation of personnel costs are maintained in the program files. This position has a 35-hour work week. (Admin 100%)

Public Health Sanitarian (2): The Public Health Sanitarians will be responsible for completing LIRAs and clearance inspections on units belonging to successful applicants to the program. The Public Health Sanitarians will also be responsible for documenting these inspections in a manner consistent with HUD regulations. These positions each have a 40-hour work week. (Direct 100%)

Program Assistant: The Program Assistant will be responsible for assisting applicants with collecting documentation during the intake process, as well as answering questions for applicants and program participants. The Program Assistant will conduct outreach to applicants whose applications are incomplete and assist applicants with obtaining documents. The Program Assistant will be the first point of contact for applicants and participants who have questions or concerns about the Program. The Program Assistant will travel to applicants' homes to collect documents if they are unable to submit them electronically or by mail. The Program Assistant will ensure that documentation received from applicants is filed and organized. The Program Assistant will assist the PD with the generation of required HUD reports, and complete low-level administrative tasks as required. The program assistant will also assist with outreach activities as required. This position has a 35-hour work week. (Direct 65%; Admin 25%; Other 10%)

Housing Rehabilitation Field Specialist (Part-Time): The Housing Rehabilitation Field Specialist will be responsible for completing Healthy Homes inspections in units that will be assisted. This staff member will also assist with the PM's duties as needed. This position has a 20-hour work week. (Direct 100%)

Authorized Official (AO): The AO provides high level oversight on program policies, procedures, and finances. This position has a 40-hour work week. (Admin 100%)

Participating Organizations: RCOCD's partner organization is the Rockland County Department of Health (RCDOH). RCOCD primarily works with two RCDOH programs: The Childhood Lead Poisoning Prevention Program (CLPPP); and the Rental Registry Program. RCDOH will identify units through these programs and refer them to RCOCD's Program. RCOCD will work with a variety of community organizations to ensure that information regarding the Program is widely available throughout Rockland County (the "County").

Selection of Properties and Available Financial Assistance: Unit eligibility and client priority will be managed by the Program Director and Program Manager. After all minimum criteria are met; units will be prioritized to meet the needs of children with identified elevated blood lead levels (EBLLs); units with children under the age of six (6); and units with pregnant women. The unit must have been built prior to 1978. Payment of property taxes and homeowner's insurance on the property must be current.

Owner- Occupied Units

The unit must be the owner's primary residence. The household income must be less than 80% of the Area Median Income (AMI). Ninety percent of units assisted will must be occupied by a child under the age of six (6) or a pregnant woman. Staff will prioritize units with a child less than six (6) years of age who resides or spends a significant amount of time in the unit, or a unit where a pregnant woman resides. As used in this policy document, a significant amount of time is defined as at least three (3) hours per day on two separate days in a week (6 hours per week) and at least 60 hours total per calendar year. No matching funds will be required for these units.

Rental Units

Fifty percent of rental units served must have a household income of less than 50% AMI. The remaining 50% of rental units served must have a household income of less than 80% AMI. No rental units will be served if the household income exceeds 80% AMI. Staff will prioritize units with a child less than six (6) years of age who resides or spends a significant amount of time in the unit, or a unit where a pregnant woman resides.

Should the current occupants vacate the assisted unit during the Regulatory Period (beginning upon final inspection of the assisted unit and acceptance of the completed rehabilitation activities by RCOCD and ending three years thereafter), property owners must give priority to families with children under six (6) years of age when selecting new tenants.

Matching funds may be required for these units. The level of match contribution will be determined on a case-by-case basis at the discretion of RCOCD.

Multifamily Rental Units (≥ 5 Units)

Multifamily rental units are eligible under this Program; however, the owner must contribute significantly to the cost of remediating the lead hazards in their properties, especially for large housing complexes. The level of owner match will be determined based on the total units assisted - If five (5) or more units are assisted the owner will be responsible for providing 30% of the total project cost as match. A child is not required to be in occupation within a multifamily unit in order to provide lead hazard control assistance, except in the case of studio or zero-bedroom units. The owner must agree to give priority to families with children under six (6) during the Regulatory Period.

Studio or Zero- Bedroom Units

Studio or zero-bedroom units will be considered ineligible unless a child under the age of six (6) resides in the unit, is expected to reside, or spends a significant amount of time. "Expected to reside" means that there is actual knowledge that a child will reside in the dwelling unit. If a resident woman is known to be pregnant, there is actual knowledge that a child will reside in the dwelling unit. Program staff must gather documentation to support actual knowledge, such as a lease showing that a child and/or pregnant woman will reside in the unit.

Vacant Units

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 (6) years of age who qualify as low-income (*i.e.*, less than 80% AMI). The owner must also agree to sign a one-year lease with the family with an option for a second year. Additionally, the property owner must sign a participation

agreement with Rockland County, agreeing to give priority to families with children under the age of six (6) for the Regulatory Period. The agreement will prohibit retaliatory eviction and mandate that rental property owner(s) will adhere to Fair Market Rent values and market units to low-income families with children under the age of six (6) and prohibits retaliatory eviction. Rental property owner(s) are required to pay back the total amount of grant funds expended if they fail to meet program requirements for the Regulatory Period. Vacant units served must be rented or sold and subsequently occupied by an eligible family within six (6) months of receiving funds, or the property owner must repay the funds to the County.

Unit Prioritization

Once an application for assistance has been approved, scopes of work will be submitted to contractors on at least a monthly basis. If the number of approved units waiting for work exceeds contractor capacity, approved units will be prioritized in the following order:

- i. Units where a child under the age of six (6) or a pregnant woman who has confirmed EBLLs resides; and units where a child under the age of six (6) spends a significant amount of time (defined as at least three (3) hours per day on two (2) separate days in a week, and at least sixty (60) hours total per calendar year) ;
- ii. Units where a child under the age of six (6) or a pregnant woman resides with confirmed lead hazards that have been referred to the program by RCDOH;
- iii. Units where a child under the age of six (6) or a pregnant woman resides that have not been referred to the program by RCDOH;
- iv. Units where no child under the age of six (6) or pregnant woman resides;
- v. Multifamily rental units where no child under the age of 6 or pregnant woman resides;
- vi. Vacant rental units.

Operational Procedures: The program will be administered and monitored by RCOCD. 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 Homes 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 the number of current jobs, satisfactorily completed jobs, complaints, resolution of complaints, and performance within the allowed time period. Also, relocation files will be maintained for each applicant documenting same.

4. Contractor registration: Each contractor must have on file a: technical proposal; cost proposal; proof of general and auto liability, workers compensation, and disability insurance; and proof of licensure by the Environmental Protection Agency (EPA). The Program will establish a pool of lead-based paint contractors to complete rehabilitation work.
5. Contractor selection: RCOCD currently has a pool of contractors being utilized for state funded remediation projects. These contractors will be utilized in the early phases of this Program until RCOCD is able to procure contractors specifically for HUD funding. RCOCD will establish a list of contractors able to perform work in compliance with applicable standards through a formal Request for Qualifications (RFQ) process. Once the list of contractors has been established, all eligible approved units on each application will be bid out to the list of contractors. All contractors will be verified in Sam.gov and sent to HUD for eligibility.

How funds will be dispersed: RCOCD will reimburse contractors on a cost-reimbursable basis. The contractors will submit billing statements on a bi-weekly basis. Only those costs, that are determined to be allowable, allocable, and reasonable in accordance with the cost principles of 2 CFR Part 200, Subpart E will be reimbursed. Licensed EPA Lead Abatement and Renovation Repair and Painting (RRP) contractors will enter into contracts with owners of the units scheduled for lead hazard control work. The contractor will be allowed bi-weekly periodic payments, utilizing request for payment forms. These forms will be submitted to the Program Manager and Fiscal Officer of the Lead Hazard Control Program. All work must be approved by the Fiscal Officer and Program Manager before payment is made. Generally, no funding will be advanced to the contractor for labor or materials. However, RCOCD may at its sole discretion, advance such costs on a case-by-case basis, including but not limited to long-term projects or those involving high-cost renovations. For extended projects, RCOCD reserves the right to disburse payments in up to three (3) installments upon satisfactory completion of clearly defined project milestones.

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 issuing a RFQ for qualified lead abatement and RRP contractors. A predesignated number of these qualified contractors will be added to a list of contractors allowed to perform work for this Program.

As units are identified as eligible, contractors on this list will be provided with the scope of work. The contractors will be given a week to provide a quote for the scope of work, and a timeline for the completion of the work. The contractor who can complete the work within a reasonable timeframe for the lowest price will win. For example, if one contractor has the lowest price but does not have availability to complete work on the unit within a month, and another has a slightly higher price but can complete work on the unit within a month, the second contractor may be selected.

The program 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.

Program Evaluation, Data Collection, and Research: 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 at baseline (before the intervention) and 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 lead control actions.

Outcome measures that will be assessed as part of this evaluation are lead dust levels, lead paint samples, and blood levels of children under six (6) years of age screened in accordance with the Centers for Disease Control (CDC) 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.

The sequence of tasks for the life of the project period of performance is as follows:

1. Begin project management (03/15/25 to 03/15/29). The key personnel for this task are the Program Manager, Project Director, and Fiscal Officer. **The Lead Program will seek to obtain HUD's approval for the Release of Funds Request (HUD Form 7015.15) in a timely manner.**
2. Identify/inspect units (06/15/25 to 03/15/29). The key personnel for this task are the licensed Lead Inspectors/Risk Assessors from RCDOH and the Program Manager.
3. Implement screening/treatment (06/15/25 to 03/15/29). The key personnel and/or organizations for this task are employees of RCDOH CLPPP and Rental Registry Program.
4. Prepare specifications (06/15/25 to 03/15/29). The key personnel for this task are the Housing Rehabilitation Field Specialist and RCDOH Lead Inspectors/Risk Assessors.
5. Initiate relocation process (06/15/25 to 03/15/29). The key personnel for this task are the Project Director and Program Assistant.
6. Complete interim controls and abatement techniques (06/15/25 to 03/15/29). The key personnel for this task are the licensed contractors and licensed workers.
7. Conduct pre- and post-testing/follow-up (06/15/25 to 03/15/29). The key personnel and/or organizations for this task are the licensed Lead Inspector/Risk Assessors, and other staff members of RCDOH CLPPP.

Community Education, Outreach, and Training:

Program Marketing : Marketing, including education and outreach efforts, will be a joint effort by RCOCD and RCDOH. RCOCD's Project Director and Program Assistant will coordinate all outreach activities and will work closely with RCDOH to ensure unified recruitment and awareness efforts.

RCOCD will reach out to its network of non-profit organizations to distribute information regarding the Program throughout the County.

Information regarding lead hazards will be distributed to all owners of, and families residing in, units with lead hazards.

Lead Hazard Control Activities Including Testing, Interventions Conducted, and Relocation:

Lead Hazards will be eliminated in two hundred twenty-two (222) housing units: Each housing unit served 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.

The Program will utilize a site-specific lead inspection/risk assessment. All state and Federal standards for a combined lead paint inspection/risk assessment and remediation will be followed. All inspections will be performed by qualified inspectors. Inspections must be done using an XRF analyzer. XRF readings of greater than 1.0mg/cm² 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.

To ensure that lead-safe units remain affordable owners will agree to a set of stipulations that include the requirement that the owner must not raise the rent by more than 3% per year for the Regulatory Period and to give priority to renting too low to very low-income families who have children under six (6) years of age living in the unit. The Regulatory Period of three (3) years will not begin until the hazard control process has been completed and accepted.

Intervention Strategies and Assessments – Lead Hazard Control: Lead Risk Assessment, Lead-based paint evaluations and intervention strategies, techniques and treatments for individual units will be consistent with the guidance provided in the HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (2012 edition), as it may be amended or revised in the future. Abatement work will be carried out among the list of certified contractors that RCOCD maintains.

HUD requires that all identified Lead-Based Paint hazards are addressed in the properties receiving assistance. This is achieved through a combination of interim controls and abatement of lead hazards that typically includes window replacement, stripping of other friction surfaces such as doors and jambs, mouth-able/chewable surfaces such as windowsills and stabilization of all other deteriorated surfaces (interior and exterior). A specialized cleaning and clearance testing is conducted before residents are allowed to reoccupy the unit.

Property Owners will work with the Program Manager to establish the corrective action to address the lead hazard issues.

Scope of Work: 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, and the use of the components and likelihood of exposure to a child under the age of six (6). Per statutes, a lead hazard is defined as: the presence of lead base substances greater than 1.0mg/cm² on chewable, accessible, horizontal surfaces that a young child can mouth or chew; lead base substances greater than 1.0mg/cm² 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 1.0mg/cm² 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 (ppm). The Program will adhere to all HUD, State and Local regulations regarding lead paint requirements, and when a discrepancy is found among them, the most stringent policy will be followed.

All persons performing the Lead-Paint Hazard Control work must be properly licensed and certified. Documentation for each project shall be submitted to Program staff prior to the contract being awarded. Overall responsibility for ensuring integrity of this process falls to the Program Manager.

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 HUD 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, RCOCD 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 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 casefile 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.

Staff will explore the various options available to the occupant, based upon needs expressed and expenses that will be incurred. The Project Director 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 are projected to be five (5) to fourteen (14) calendar days. Assistance

with temporary housing will be provided 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 will perform a visual inspection and take clearance samples as prescribed by federal and state guidelines and regulations. An independent, licensed laboratory analyzes the dust samples and provides an analysis of the results to RCDOH staff, who then notifies the Program Manager and Project Director. 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 projects¹ or EPA's minor repair and maintenance work threshold² for unassisted projects—special measures to protect residents from exposure to leaded dust are not required (HUD and EPA area threshold definitions). Basic precautions are strongly recommended. These include not using prohibited paint-removal practices, cleaning the work area thoroughly after work is completed, and if a child under the age of six (6) resides in or accesses the unit or area, keeping 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 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 the 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. Residents who remain in their units or vacate only during workday hours while such limited area work is being conducted will be required to sign a statement that:

¹ HUD's *de minimus* threshold level is as follows: 20ft² on exterior surfaces; 2ft² in any one interior room or space; or 10% of the total surface area on an interior or exterior component with a small surface area, like windowsills, baseboards, and trim.

² Per the EPA, minor repair and maintenance activities are those that disturb 6ft² or less of paint per room inside or 20ft² or less on the exterior of a home or building, not including window replacement and demolition of painted which are never considered minor.

- 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;
- 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 (5) 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 older, 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 risks.
- Relocation Unit Types: 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 980.401) or physical condition standards (24 CFR 5.703). If they were constructed before 1978 and are not HUD-assisted, they should also pass a visible 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 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, 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. 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 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 a vacant additional unit, 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.

- Hotel Relocation: RCOCD will establish a list of eligible hotels throughout the county which households may choose from. RCOCD will arrange to pay these hotels directly for the room rate. Incidental charges (including but not limited to damages, pay-per-view charges, laundry services, etc.) will be the responsibility of the household. Households will be eligible for a second room only if the household size is above the occupancy size of the hotel room, or if an extra room is required as a reasonable accommodation for a medical condition or disability.
- Meal Stipend: All households being temporarily relocated will be eligible for a stipend for food in accordance with GSA per diem rates.