WORK PLAN
LEAD HAZARD REDUCTION PROGRAM
FRESNO COUNTY DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH DIVISION

SUMMARY AND PURPOSE

The Fresno County Department of Public, Environmental Health Division (EHD) is a division of the Department of Public Health and is responsible for oversight and all deliverables under the Lead Hazard Reduction Grant Program funded by the Housing and Urban Development Department's HUD FY 24. The Fresno County Lead-Based Paint Hazard Control Grant Program has been funded $4 million and is projected to close out on March 17, 2029.

The target area is the County of Fresno including incorporated cities. Outreach will focus on cities of Coalinga, Firebaugh, Fowler, Fresno, Huron, Kerman, Kingsburg, Orange Cove, Parlier, Reedley, Sanger, Selma, and incorporated communities in Fresno County. These cities have the highest density of children with elevated blood lead levels in Fresno County and the highest concentration of older housing and low and very low-income households.

To ensure successful and steady recruitment of units, staff will carry out Countywide outreach with a variety of community partners and those involved in the management and maintenance of low-income properties while also focusing resources and prioritizing properties associated with lead-poisoned children and in high-risk neighborhoods. The EHD staff will also build awareness, expertise, and the capacity of individuals, property owners, and organizations to establish lead-safety as the standard for property maintenance. This proposal is consistent with the Consolidated Plans of the jurisdictions, the Strategic Plan for the State of California, and the Federal Strategy Targeting Lead Paint Hazards.

Program Goals and Summary

Key Goals: The key goals of the program's increase funding are to remediate 168 housing units. The Grant will also increase lead awareness through community events, presentations, workshops and meetings, consultations, agency and community-based collaborations, targeted mailings, and building the capacity for maintaining affordable lead-safe housing by providing a total of 576 individuals with lead safety training.

Outreach: The EHD will increase lead awareness and recruit properties for participation in the lead-based paint hazard control program. The EHD staff will promote enrollment by focusing on low-income homeowners with children, owners of low-income rental units with children, and empowering tenants to share program information with their landlords. Drawing on its network of

partners and participating in a wide variety of outreach methods, staff will continue raising community-wide awareness of the health risks of lead exposure and housing deficiencies. To complete, the 168 units the staff will recruit 300 units using a simplified pre-application process with 168 of these completing the full application and being enrolled.

Key Outreach Strategies to Maximize Recruitment: Staff will pursue two key outreach strategies to identify 300 households to successfully complete the enrollment process to complete 168 lead hazard control units.

Outreach Strategy #1: Recruit eligible units with lead-poisoned children and outreach to high-risk low-income families working with its network of housing, health, and social service agencies to identify high-risk properties and family childcare centers.

Lead-exposed children: The Fresno County Department of Public Health (FCDPH) contains the Childhood Lead Poisoning Prevention Program (CLPPP). The FCDPH CLPPP is responsible for case management of lead-poisoned children throughout Fresno County. Exposure to deteriorated lead-based paint, leaded dust, and lead-contaminated soil are the major sources of lead poisoning for the children in Fresno County. There are currently 36 open cases, 48 open potential cases, and 1,334 surveillance cases that can potentially qualify for lead hazard remediation. Property owners of these open property cases were made aware of the lead hazards but lack the funding to provide remediation. Therefore, the EHD state certified Inspector/Assessors will review each case and promote property owner voluntary compliance, participation in the lead-based paint hazard control program, and seek more aggressive action working with the District Attorney's Office when necessary.

Outreach to other high-risk families: Raise awareness of lead poisoning principles and encourage low-income families to enroll in the grant program by continuing to work with a network of community-based partners, including community-based organizations, health care providers, and social service agencies. Staff will recruit clients from its website, social media, in-home consultations, news media spots, community events, and presentations.

Outreach Strategy #2: Focus on High-Risk Neighborhoods: Within the target area, staff will recruit lead hazard control units in the five-targeted zip codes (93727, 93662, 93702, 93703, and 93706). Staff will use specific strategies in the targeted area with local partners to maximize recruitment.

The total population in the five-targeted zip codes is 167,253. The number of children under the age of six in the targeted area is 19,221, and the percentage of children under the age of six is 11.5%. 17,497 out of 19,221 children residing in the targeted area were under the age of six and were tested for elevated blood lead levels. 1,206 of these children that were tested have an elevated blood lead level at 3.5µg/dL or above. According to the Fresno County Consolidated Plan, there is an estimated 330 lead poisoning cases per year. 41.1% of the families in the targeted population have income that is less than 80% of the area median income and 61.6% has less than 50% of the area median income. There are

approximately 48,927 housing units in the targeted area and 26,582 of the housing units are pre-1970 with 14,781 occupied rental housing units and 10,844 owner-occupied housing units. With a high percentage of at-risk, low-income families with young children, the EHD will reach out through partnerships with community-based and faith-based organizations and be supported through the Fresno Housing Authority and Fresno Economic Opportunities Commission to assist with stabilizing these communities. These agencies will join force to co-qualify applicants and provide weatherization services during the lead hazard remediation to improve substandard housing conditions.

Training

Staff will increase local capacity to conduct lead safe work practices by training a total of 576 individuals in the construction/building industry to increase their knowledge of lead safety.

Intake

Staff will recruit units using a simplified pre-application process in multiple languages and formats (printed brochures and phone line sign-up with interpretation services upon request).

Selection/Prioritization/Enrollment

Upon application, the property will be researched in County property records, the EHD database, and the State lead poisoning case database. Pre-applications will be reviewed for eligibility by the EHD lead staff. The EHD lead staff will contact the property owner to ensure the owner understands the program and ensure the unit and household are eligible for participation. For all rental properties, the owner shall adhere to the required three-year commitment to make units available to low-income families, market units as suitable for families with young children, and give priority in renting to families with children under six who are CLPPP's clients. The pre-application will then be rated and compared to other pre-applications. The highest rated pre-applications will move forward to the full application process. Once a project is moved to the full application status, a supplemental application is provided for income and eligibility information and household details. Qualifying households will be asked to provide the previous year's tax return 1040 form. The 1040 method is the method of choice to qualify applicants. Applicants will be qualified based on the previous year's total adjusted gross income. If the tax return 1040 form is not available or if it's within 6 months of the application, then other financial documentation will be required to project the household income for the next 12-month period. In the absence of the tax return 1040 form, copies of the most recent paycheck stubs, W-2, public assistance records and databases, bank statements, and self-certification or property owner certification where appropriate will be required. Balancing documentation is required in order to make a timely determination of eligibility, not to unreasonably delay or deny service to families, and to avoid creating a barrier to participation for families without access to all detailed documentation. For updates, the EHD will gather

additional information, documentation, and certifications to review and update or revise the 12-month income projection. The goal timeframe is to collect information and available documentation and make eligibility determination within one week from application submission. A site visit may be required in some instances to obtain more information, copies of documentation, or certifications. The Department will utilize bilingual staff, phone, and in-person interpretation, and translation services as outlined in the Department of Public Health interpreting services to make services available to limited English proficiency clients. In keeping with the tiered approach established in HUD's policy guidance, the EHD will seek available documentation and information to make a reasonable and timely determination of anticipated annual household income. Applications and eligibility documentation will be reviewed and completed applications will move forward for lead evaluation based upon priority rating. Additional information and/or site visits may also be performed to confirm feasibility, likely presence of lead hazards, and filed conditions.

Priority Projects: Properties associated with lead poisoned children will receive priority in processing. Property selection priority will be given to units occupied by families with lead poisoned children, children under six living or spending a significant amount of time, or with a pregnant occupant. Properties must be privately owner eligible housing in Fresno County and meet Section 1011 eligibility requirements. Properties will be prioritized by the following criteria: association with lead-exposed children, units with children under six years of age or pregnant occupants, year built, and multi-unit properties for cost effective production of lead-safe units. Additional points will be provided for participation in housing rehabilitation or housing support programs.
The following prioritization rating system will be used for properties where pre-applications are received to determine which move forward to the next steps. Properties associated with lead poisoned children will be expedited. Exceptions can be made at the discretion of the Program Manager. Projects enrolling more than 10 units will be reviewed on a case-by-case basis for suitability as family housing for families with young children and will be submitted HUD for approval.

Category	Item	Points	Notes
Child Occupancy	Child-occupied unit	10 points per unit	Child under 6 residing/spending significant time/pregnant occupant
Priority Points	EBL	10 points per unit	Child with an EBL under 6 residing or spending significant time
	Housing Rehab/code enforcement	6 points per project	Includes the Fresno Housing Authority, Economic Opportunities Commission, code enforcement, etc.

	referral/partner project		
	Family Home Child Care	3 points per unit	
	Per participating unit	3 points per unit	
	Per Section 8 unit	3 points per unit	Per participating unit with existing Section 8 tenant. Note: Tenant-based vouchers only. Project-based Section 8 not eligible.
Age of Property	Pre-1960 or 1960-1978 with identified lead hazards	10 points per property	

Household Income Eligibility: Households with incomes at or below 80% of HUD median income will be eligible, with the exception that up to 20% of rental units in any one building may be over this income limit. For the overall grant unit portfolio, at least 50% of rental units will be occupied by or made available to very low-income families at or below 50% of median income. All applicants will be subjected to a third-party income verification if needed. All full-time employee applicants will be provided with a Third-Party Income Verification Form to their employers. Grant staff will follow-up for the form by either contacting the applicant or the employer. If forms are not filled out and submitted to the program in a timely manner, grant staff will follow-up with three attempts with the proper documentation and or contact the landlord for verbal income verification. Grant staff will contact the SSI and department of social services for income verification for all SSI and cash aid applicants. Calls and attempts will be properly documented. All self-employed applicants will need to provide tax returns from the previous year or provide self-certifications to the grant staff. Proper documentation is required for all unusual circumstances.

Production Process: It is expected that it will take from 12 to 14 weeks from the completion of the application until the project achieves clearance, although larger multi-unit properties may take longer. Projects follow a process developed during prior lead hazard control grants. When the application is received, it is reviewed by EHD staff for completeness and eligibility of both units and households, with follow-up for documentation. The owner receives an intake call to review program participation. The Project Manager reviews applications and gives approval for participation. The Lead Inspector/Assessor will make a site visit to evaluate the property condition and feasibility after which the project is referred to an environmental consultant for a lead-based paint inspection/risk assessment (LIRA). Then the project supervisor will make a site inspection, develop the scope of work, assist the owner in selecting a contractor(s), and monitor the project until clearance is achieved.

Assessments

Lead-based paint inspections and risk assessments: Lead-Based Paint inspection/risk assessments will follow the *2012 HUD Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing* and will be completed on 168 units by State certified personnel. HUD/EPA standards under 40 CFR 745 will be utilized. The new dust-lead action levels for risk assessments and clearances effective April 1, 2017, from the Office of Lead Hazard Control and Healthy Homes (OLHCHH) will be utilized. This policy guidance shall be used when conducting the LIRA and for clearing units following interventions that disturb paint. The following action levels are to be used by all OLHCHH LBPHC grantees or contractors working on behalf of grantees.

• Dust-Lead Action Levels:	Floors: ≥ 10 µg/ft²
	Window Sills: ≥ 100 µg/ft²
• Lead Clearance Action Levels:	Interior Floors: < 10 µg/ft²
	Porch Floors: < 40 µg/ft²
	Window Sills: < 100 µg/ft²
	Window Troughs: < 100 µg/ft²

Scope Design

Lead hazard Control Work Specification Development: Interventions will be designed by the EHD based upon the LIRA report findings and recommendations and the results of an on-site inspection. Interventions will be primarily interim controls such as paint stabilization and landscaping for soil coverage. On a limited basis, where interim control strategies will be ineffective or not feasible because of deterioration or other adverse conditions, or would not be cost effective, permanent abatement strategies will be used. The work items will be based on standardized work specifications. EHD staff will complete environmental reviews for each individual project per 24 CFR part 58. A Programmatic Agreement is in place with the State Historic Preservation Office, and the EHD will work with local cultural heritage agencies and access public information from hazardous materials sites registries in addition to on-site assessments.

Documentation Review: All lead hazard control work plans and other contract documents will be reviewed to ensure that all lead hazards are addressed and meet HUD requirements. The Program Manager will ensure that specified work meets HUD contract requirements.

Procurement and Contracts

Financial Terms and Conditions: Financing will be grants set up according to established EHD procedures. Lead hazard control costs are projected to average $15,500.00 per unit. The average cost of the unit has increased due to the cost of materials and supplies and limited number of abatement contractors in the area. The maximum allowable cost per single dwelling unit is $30,000.

Maximum Funding for up to 10-unit properties: $10,000 per unit

Maximum funding amounts for properties with more than 10 units will be determined on a case-by-case basis. Additional lead hazard control funds above the maximum stated above may be authorized by the EHD Program Director with written justification.

Incentive for Training: As an incentive for skill building, owners with approved applications will receive discounted fees for approved lead-safety training. EPA Renovation, Repair and Painting training and individual renovator certification will be available free to owners and their sponsored maintenance works who have an approved application. Firm certification with the EPA will be the owner's responsibility.

Program Agreement: Rental owners will sign and certify to a Program Agreement requiring they make units available to low-income families, market vacant units to agencies and families as suitable housing for families with children under six and give priority in renting vacant units to families with children under six for three years after the completion of the project. Owner shall maintain records of rent levels, vacancies, and marketing efforts to demonstrate compliance with this section and provide copies of these records to the EHD upon request. An annual follow-up inspection will be conducted for the warranty of the work. On-going technical assistance on maintaining the property in a lead-safe and healthy condition will be available to the property owner including on-site visual assessment and consultation. Compliance concerns during the three-year period will be addressed through educational assistance and administrative remedies including funds recapture with legal remedies utilized where appropriate. Rental properties will be listed on a lead-safe registry for three years after completion.

Bidding and Contractor Selection: Each project will be bid to a list of contractors with a lead-trained and certified workforce and lead hazard insurance. An email will be sent to inform the contractors of bid opportunities with the scope of work. Bids will be evaluated for cost-reasonableness and completeness. The owner may select the lowest cost responsible bid or pay the difference for a higher cost bid. Simplified methods may be used where project cost is not expected to exceed the micro purchase threshold. Where appropriate, the project supervisor will hold a preconstruction conference with the owner and contractor to minimize misunderstandings. Contracts, standard specifications, and financial documents will include grant and regulatory

requirements. After a contractor is selected, the owner and contractor will sign contract and financial documents. The LIRA will be provided to the selected contractor during the contract signing. If required work exceeds funds available through this grant, the project supervisor will work with the owner to identify additional resources from the owner or from local government or non-profit partners.

If a contractor has six or more awarded projects without the issuance of a Notice to Proceed (NTP), they may not bid on any additional projects. Once the contractor has less than six awarded projects that have not been issued a Notice to Proceed (NTP) they may submit new bids for grant projects.

Contracting and Purchasing: Contracts for lead evaluation, laboratory analysis, and other services will follow Federal and County requirements and contain clear scopes of work with specified timeframes and quality assurance standards. Quality and conformance will be reviewed by EHD staff to ensure that services provided comply with contract and grant program requirements. Department staff will ensure that supporting and cooperative partners understand program requirements.

EHD utilizes an automated financial management system and staff expertise to maintain adherence to HUD grant financial requirements. EHD follows 2 CFR 200 guidance to determine allowable costs, maintains complete financial records for program expenditures, and produces reports listing expenditures specific to each grant fund. The DPH financial personnel will review eLOCCS drawdowns before submission including the Part 3 Financial Reporting form and other required documentation, VRS Request Voucher for Grant Payment and supporting documentation for all costs on VRS requests exceeding $100,000 and any other documentation requested by the Government Technical Representative. The Department adheres to the financial requirements of Fresno County. Audit reports comply with 2 CFR 200. The EHD notifies contractors and trainees regarding employment and contracting opportunities through trainings, mailings, and other outreach. In contracting and procurement, EHD outreaches to small businesses through the County's list of Small, Local and Emerging Businesses to ensure they are aware of contract opportunities and the County's Office of Acquisition Policy carries out consistent outreach to small businesses. The Program Manager monitors Section 3 contract percentage.

Occupant Protection Measures: An occupant protection plan will be prepared, and occupants will be notified of the project schedule. When only exterior work or minimal interior work is performed, occupants will be protected by secure barriers and signage to isolate the work area as per Chapter 8 of the 2012 HUD *Guidelines.*

Temporary relocation: Expenses will be minimized through work scheduling and containment strategies. Relocation to lead-safe units in multi-family housing will be used when possible. Temporary relocation will be typically for periods of five days or less and tenants will be assisted with relocation in accordance with the Uniform Relocation Act. The EHD staff will work with the family and ensure that individuals with disabilities or special needs receive appropriate accommodations in accordance with Section 504 and other regulations. When other relocation options are not available, tenants will be relocated to a motel. Temporary storage will be provided if belongings need to be removed from the unit temporarily and pet boarding will be provided if no other options are available and it is required for the safety of workers, residents, and the pets. When temporary relocation is necessary, units will pass clearance prior to re-occupancy. Tenants will return to their original unit and will not be required to move permanently because of the work.

Unit Monitoring

Site visits to monitor the work will be carried out at key project sites periodically by the EHD CDPH state certified Lead Project Supervisor and or Program Manager to ensure that work site preparation, occupant protection, and safety requirements are being followed, and the work is being completed appropriately. A final inspection in addition to the clearance examination will be done to ensure that the scope of work is completed and quality meets specification. Owners will be requested to complete an evaluation of the contractor at the end of the project.

In pursuing comprehensive interventions, the EHD will work with a variety of agencies to incorporate, align, and/or coordinate non-lead work with lead work. When funds are available from other agencies and from owner contribution, the work may be added to the lead hazard control scope of work with a separate bid outbreak. Joint projects such as weatherization or where owners are carrying out independent repairs, will be carefully coordinated so that lead hazard control work is done by qualified contractors and so that the work is completed in a timely fashion, properly sequenced, and occupants are protected.

Clearances: Each unit will pass a clearance examination by a state certified professional after the work is complete and before re-occupancy where temporary relocation is required. A visual inspection will also be conducted by the project supervisor to ensure that work is completed in accordance with specifications. Where temporary relocation is necessary, clearance results will be expedited to speed re-occupancy within 24 hours of work completion. If clearance is not achieved and the failure is deemed the result of inadequate cleaning, the contractor will bear the cost of second retests.

Contractor Payments: Contractor payment for progress and completion payments will be processed with an invoice and signed Notice of Completion that

will be signed by the contractor, the owner, and the Project Director or Program Manager. The Program Manager will review and approve the payments. Payments will be approved for completed work after the Notice of Completion is filed.

Post Project Monitoring

Post-Lead Hazard Control Maintenance of Units: EHD staff will provide the owner with guidance on compliance with the three-year requirements and an Operations and Maintenance Manual that will establish a schedule of visual inspections and describe lead-safe maintenance practices to be followed after the lead hazard control work is completed. An annual follow-up inspection will be conducted for the contractor's one-year warranty.

Three-Year Availability Requirement: Rental owners will sign a Program Agreement requiring they make units available to low-income families, market vacant units to agencies and families as suitable housing for families with children under six and give priority in renting vacant units to families with children under six for three years after the completion of the project. Rental properties will be listed on a lead-safe registry for three years. Compliance concerns during the three-year period will be addressed through educational assistance and administrative remedies with legal remedies utilized where appropriate.

PROGRAM MANAGEMENT

Implementation: The Department of Public Works and Planning, Community Development Department will complete the programmatic environmental review to comply with 24 CFR Part 58, and the EHD will handle the Request of Funds process, have contracts in place, and take all other actions necessary to commence lead hazard control. The Grant does not include conducting research involving human subjects.

Key Personnel:

Richard Heinrichs, EHD Environmental Health REHS Supervisor, will be the grant Project Director and is responsible for grant implementation, budget, and personnel management.

Bee Vang, Program Manager: She will directly support the undertaking of lead hazard control activities of the grant staff unit work. She will track intake, review and approve applications and prepare/approve documents to be signed by applicants for lead hazard control work, for arranging temporary relocation, reimbursement and provide assistance to residents relative to the lead hazard control work being done. She will also assemble and publicize bid tours. In the absence of the field staff and to manage the high number of projects undergoing the remediation process, she will provide on-site monitoring of LHR, go out to talk to applicants/tenants to assist with the application process, process applications, provide outreach education, collect financial documents, draft SOW and BID

SOW, attend bid tours, provide abatement consultation for the contractors, conduct clearances and quality paint inspections, conduct one-year monitoring, and back fill any necessary field duties and functions to keep the projects going . Prepare quarterly program performance and related functions, plans and discuss work assignments with staff assigned to the LHC projects and conduct clearances when necessary.

Fiscal Officer: Business Manager, Irene Parada will review all Part 3 reports, labor and expense report, the quarterly SF425 report, and perform the LOCCS drawdowns.

Stephanie Howard, Staff Analyst, will be responsible for providing the labor and expense descriptions to the labor and expense report for the Part 3.

Long Moua, Environmental Health Specialist, IA and Lead Supervisor: They will be reviewing project LIRAs, drafting the SOW, BID SOW, scheduling all bid tours, verifying site containment inspections, and conducting clearances after the lead abatement remediation. In the absence of the rehabilitation specialist and to keep the projects moving, he will provide back up to conduct bid tours, provide consultation to the contractors for lead related construction related issues, process work change orders, provide quality inspections and pre-clearance inspections, and one-year monitoring.

Kevin Mak, Rehabilitation Specialist: They will be conducting the bid tours, provide consultation to the contractors for lead abatement construction related issues, process work change orders, provide quality paint inspections and pre-clearance inspections, and one year monitoring. They will review project LIRAs, draft SOW and BID SOW, schedule bid tours, verify site containments, provide unit monitoring to ensure that all remediation regulations are met by the contractors and conduct clearances when the IA/Lead Supervisor or Program Manager are off or not available.

Asia Xiong, Outreach and Intake Coordinator: They will be receiving applications from the public and processing the applications from start to end, attending health fairs, providing presentations to provide program information to the public, organize and schedule RRP trainings, and collaborating with inter-agencies to share grant information. They will provide unit monitoring, clearances, attend bid tours, and review LIRAs and draft SOW and BID SOW to ensure that all remediation regulations are met by the contractors when the IA/Lead Supervisor and Program Manager are off or not available.

The Program Manager will review the number of enrollments, paint inspection/risk assessments, projects under contract, and clearances against benchmarks to identify production shortfalls and adjust ensure production meets objectives. Projects with lead-poisoned children will receive priority scheduling at each stage and be tracked to ensure timely response. The Project Director and

Program Manager will identify barriers, develop corrective action plans, and assign staff and other resources as needed to ensure successful completion of grant objectives.

GRANT PROGRAM ACCOUNTABILITY

The Grant Management Team, led by the Project Director will meet with the Program Manager and the REHS/IA regularly to review the progress towards grant deliverables and make adjustments as needed.

Grant Program Management and Program Evaluation

The Grant Management Team overseeing day-to-day operations will meet regularly to review progress towards grant objectives, identify barriers, develop solutions, coordinate partnerships, prepare reports, evaluate program activities and outcomes, monitor financial expenditures, and ensure timely reporting and drawdown of HUD grant funds.

A set of benchmarks has been established for key activities including risk assessment/paint inspections and units completed. Progress towards these benchmarks will be reviewed quarterly to ensure that production is on track to complete all objectives within the grant period. Project status and activities are tracked in a relational database and the Program Manager will review progress monthly to identify and solve barriers to production. Properties associated with lead poisoned children will be tracked individually and prioritized for service.

Outreach, Intake, and Training Evaluation Measures: Evaluation tools that will be used for outreach and education activities include pre- and post-tests, feedback evaluation questionnaires, outreach report forms for events, sign-in sheets and participant surveys for classes, trainings, and other program and partner services. Trainees will complete an evaluation form and must pass a test to receive a Notice of Completion or RRP Certification. Evaluation forms and pass/fail rates are discussed regularly.

Outreach activities will include the core messages of 1) the importance of lead screening for children under six years old, 2) common sources of lead exposure, and 3) measures to prevent lead exposures.

Blood lead level reports are reviewed and monitored weekly, assigned to EHD staff for case management, identification of sources, and notification and recruitment of property owners into the lead hazard control program. Home visits are documented in compliance with EHD procedures to reflect the family plan of care. Case conferences with multi-disciplinary staff are held to address problems as they arise.

The Program manager will closely monitor progress on all benchmarks and will adjust outreach and recruitment activities as needed to stay on target.

Final approval of the applications will be reviewed for eligibility by staff and signed off by the program director or program manager. Environmental reports, inspection results, and work plans are created on a project-by-project basis.

Contractor Qualifications and Monitoring: The contractor will supply a list of qualified workers, insurance certificates, and a copy of the State of California notifications of abatement. After all required submittals are received, the Project Supervisor will issue a Notice to Proceed. Contractor and worker documentation will be provided for each project. All contractors performing lead hazard control work will be registered as an RRP certified firm and have a State certified Lead-In-Construction Supervisor and an EPA RRP Certified renovator who is responsible for the project. Workers will be either RRP certified or, for permanent abatement work, State certified Lead-in-Construction Workers. Permanent abatement work will be carried out by State Certified Lead-In-Construction Supervisors and /or State certified Lead-in-Construction Workers under the supervision of a Stated certified Lead-In-Construction Supervisor. Contractors will have the appropriate license for the required trades and will carry workers compensation, general liability, and pollution liability insurance. Contracts and specifications require compliance with State and Federal requirements including the RRP Rule, the Lead Safe Housing Rule, HUD Guidelines, and OSHA 29 CFR 1926.26 worker protection requirements.

Site visits to monitor the work will be carried out at key project stages and periodically by a state certified Lead Project Supervisor to ensure that work site preparation, occupant protection, and safety requirements are being followed and the work is being completed appropriately. A final inspection in addition to the clearance examination will be done to ensure that the scope of work is completed and quality meets specification. An evaluation by the owner at the end of the project is used to evaluate the contractor and as a reference for future clients.

Documenting and Tracking Goals, Activities, Costs, and Schedules:
Program database and screening surveillance systems are in place to answer grant reporting management questions including screening rates, participant information and unit locations as well as to record the receipt and status of applications for lead hazard control services. The dates for all activities associated with the project are entered into the Departments' database including enrollment, paint inspection/risk assessments, work plans, bids, clearance tests, and project closure. Database reports are regularly compared with the benchmarks outcome goals.