

Policies and Procedures



**Lead Hazard Reduction Demonstration Grant Program
and Healthy Homes Supplement Funding**

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I. Introduction

The Lead-Safe Program's (Program) is designed to reduce or control lead hazards and health and safety issues in homes in which children under the age of six reside or visit. The Program is funded through the United States Department of Housing and Urban Development's (HUD) Lead Hazard Reduction Demonstration Grant (LHRDG) and the Healthy Homes Supplement (HHS) funds, as well as City of Fort Worth (CFW) matching Community Development Block Grant (CDBG) funds also provided by HUD. All homes assisted shall meet eligibility requirements as detailed in this document. Lead grant funds may only be used for lead hazards as identified in a Lead Hazard Risk Assessment (LHRA) and to eliminate any of the 29 housing hazards identified by HUD.

The CFW will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, disability or political belief.

II. Definitions

Adult – Persons 18 years of age and older

Annual Income: all amounts, monetary or not, which: Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or are anticipated to be received from a source outside the family during the 12-month period; annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

Annual income includes, but is not limited to: The full amount, before any payroll deductions, of wages and salaries, overtime pay, the net income from the operation of a business or profession; interest, dividends, and other net income of any kind from real or personal property; the full amount of periodic amounts received from Social Security, annuities, insurance policies, retirement funds, pensions, disability or death benefits, and other similar types of periodic receipts commissions, fees, tips and bonuses, and other compensation for personal services; payments in lieu of earnings, such as unemployment and disability compensation, worker's compensation and severance pay, Welfare assistance payments, periodic and determinable allowances such as alimony and child support payments; all regular pay, special pay and allowances of a member of the Armed Forces. For a full definition and extensive examples of Annual Income please see [Part 5 Annual Income at 24 CFR 5.609, commonly referred to as "Part 5". Third Party Verification of Income is also required per Policy Guidance number 2017-05 Income Verification Guidance.](#)

Area Median Income (AMI) - midpoint of a region's income distribution – half of families in a region earn more than the median and half earn less than the median. LSP income limits are restricted to 80% of AMI. Income limits are produced by HUD annually and can be located here: <https://www.huduser.gov/portal/datasets/il.html>

Completed Application-For an application to be considered complete by the City of Fort Worth the following must be submitted: Application Form, Lead Hazard Control Blood Testing Release Form, Conflict of Interest Disclosure Form, Certification Form, Proof of Income (i.e. check stubs, current award letter, etc.) for the last 2 months for everyone living in the household who is over the age of 18, Copy of Applicant(s) current picture I.D., Agreement to attend Lead Safety Workshop. [Policy Guidance number 2017-05 Income Verification Guidance requires a third party income verification be completed.](#)

Healthy Homes Inspection – defined by HUD as the following: The inspection provides an analysis of just how hazardous a dwelling is and provides evidence and statistical information to assist assessors in making their judgments. The inspection process is a risk-based assessment and considers the effect on occupant health of any hazards in the property. Hazards are rated according to how serious they are and the effect they are having, or could have, on the occupants, that is, “the effect of the defect”. The basic principle is that the property should be safe and healthy for occupation.

Lead Hazard - Any condition that causes exposure to lead from lead-contaminated dust; bare, lead-contaminated soil; or lead-based paint that is deteriorated or intact lead-based paint present on accessible surfaces friction surfaces, or impact surfaces that would result in adverse human health effects.

Lead-Safe Workshop - Means Specialized Cleaning Techniques, On-Going Maintenance, Recognizing Lead Hazards, and Preventing Child Lead Poisoning. Program Staff will make sure that the Owner is aware of the dangers of lead hazards and the need to monitor the lead hazard reduction work and areas containing lead-based paint that were not considered hazardous at the time and therefore, did not receive treatment.

Periodic Inspection – Multifamily Units: during initial and periodic inspection of housing quality a visual inspection is conducted for interior and exterior painted surfaces to identify paint deterioration, and other specific conditions that may be lead-based paint hazards. (A visual assessment does not identify lead-based paint.) This visual assessment must be performed by a person trained in visual assessment, and may be done during the HQS inspection. A self-paced, on-line training module on visual assessment is available on HUD’s website at www.hud.gov/offices/lead. A certified risk assessor is also trained to perform visual assessment.

Program Services – The Program shall provide the following services to the homes of eligible Applicants free of charge:

- Lead-based paint inspections
- Testing of children under the age of six for lead poisoning
- Interior and/or exterior painting using lead safe work practices
- Specialized cleaning techniques to address lead dust
- Replacement of lead-contaminated components such as doors, windows, and siding if necessary
- Treatment of outside causes of lead contamination

Program Staff – City of Fort Worth employees who are assigned to the Program

III. Program Qualifications

In order to qualify for any Program Service, the Applicant and home must meet all of the criteria outlined below.

Preliminary Program Qualifications – All Types of Units:

- The home must be located in the City of Fort Worth;
- The home must have been built prior to 1978;
- Proof of home ownership by either the applicant or the landlord (landlord authorization will be required later in qualification process) of the rental unit as shown on the Tarrant County Appraisal District website; however, a Warranty Deed or Deed of Trust may be used in place of this requirement as required;
- A child under the age of six either lives in the home or visits the home at least 2 separate days a week for at least 3 hours each day or a woman who is pregnant lives in the home/unit; or a total of 60 or more hours a year;
- The combined household income for everyone living in the household who is 18 years old or older must be less than 80% of Area Medium Income (AMI); and
- The home cannot require more than \$5,000 in non-LSP type repairs, with need for repairs determined solely by Program Staff.

Program Qualifications Single Family Owner Occupied Units:

- The home must be located in the City of Fort Worth;
- The Applicant must own the home as shown on the Tarrant County Appraisal District website; however a Warranty Deed or Deed of Trust may be used as required;
- The home must have been built prior to 1978;
- A child under the age of six either lives in the home or visits the home at least 2 separate days a week for at least 3 hours each day or a woman who is pregnant lives in the home/unit; or a total of 60 or more hours a year;
- The combined household income for everyone living in the household who is 18 years old or older must be less than 80% of Area Medium Income (AMI); and
- The home cannot require more than \$5,000 in non-LSP type repairs, with need for repairs determined solely by Program Staff.

Program Qualifications for Rental Units Including Single Family, Duplex, Tri-plex, Quadplex and Multi-Family (Five-or-More) Units:

- The home/unit must be located in the City of Fort Worth;
- The Applicant must occupy the rental property as their primary residence;
- The home/unit must have been built prior to 1978;
- A child under the age of six either lives in the home or visits the home at least 2 separate days a week for at least 3 hours each day or a woman who is pregnant lives in the home/unit; or a total of 60 or more hours a year;
- Income requirements for rental housing are as follows: at least 50 percent of the units must be occupied by or made available to families with incomes at or

below 50 percent of the area median income level and the remaining units shall be occupied or made available to families with incomes at or below 80 percent of the area median income level, and in all cases the landlord shall give priority in renting units assisted under this section, for not less than 3 years following the completion of lead abatement activities, to families with a child under the age of six years, except that buildings with five or more units may have 20 percent of the units occupied by families with incomes above 80 percent of area median income level – as such income limits for rental units are set at 80% AMI with preference given to units occupied by families at or below 50% AMI;

- Multifamily Properties (greater than 5 units in a single dwelling): The combined household income for all adult tenants living in a single rental unit must be less than 50% AMI; however, one rental unit with a combined household income for all adults between 50% and 80% AMI will be accepted into the program for every two rental units meeting the 50% income requirements from the entire property. Units with household incomes of less than 80% will be placed on a list based on the date of a completed application. Placement on the waitlist does not guarantee that the property will receive services;
- Single Family Properties: The combined household income for everyone living in the household who is 18 years old or older must be less than 80% of Area Medium Income (AMI)
- The home cannot require more than \$5,000 in non-LSP type repairs, with need for repairs determined by Program Staff;
- No rental units may have code citation in the last 2 years;
- For multifamily properties, the entire property must have a current Periodic Inspection;
- Applicants must follow HUD Fair Housing Policy and not have any open Fair Housing Violations;
- Rental property owners must agree to:
 - Allowing the City to list the property on a Lead-Safe Program registry;
 - Provide the City the identity (name, age, income and race/ethnicity) of any tenants that occupy the units receiving LSP services for three years following LSP work completion;
 - Advertise and make the rental units receiving services available to low to moderate-income tenants with children under the age of 6 for three years following completion of program services; and
 - For property Owners who own 5 or more rental units, the property Owner must pay the cost to relocate the family in the home/unit being repaired to a lead safe unit.

Units Not Eligible for Program Services

- Properties located outside the City of Fort Worth;
- Properties owned by a bank through a foreclosure process;
- Property Owners who have an outstanding City of Fort Worth Code citation
- Properties in which the Owner is unable to show clear title / proof of ownership
- Properties with unrepaired fire and/or water damage

- Properties that are structurally unsound as determined by City of Fort Worth
- Properties that are located in a floodplain
- Properties that contain excessive personal items which prohibit Program Staff or contractor(s)' ability to perform inspections/risk assessments properly as determined by Program Staff; and
- Properties that have previously received any kind of grant funding for lead hazard reduction services through the City of Fort Worth.

IV. Prioritization of Services

Eligible Homes/Units will be provided Program Services under the following Priority Schedule with Priority 1 being the highest priority level and Priority 5 being the lowest:

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|---|------------|
| Low and Moderate Income Housing Units where Children with Elevated Blood Lead Levels (EBLL) Reside | Priority 1 |
| Pre-1940 Housing Units with Children Under Six in Target Zip Codes | Priority 2 |
| Pre-1940 Housing Units with Lead Hazards Present in Target Zip Codes, where Children under Six spend Significant Time Visiting | Priority 3 |
| Pre-1978 Owner or Rental Housing Units with Children under Six, Lead Hazards Present and Low-Moderate Income Renters/Affordable Rents | Priority 4 |
| Pre-1978 Housing Units with Lead Hazards Present, where Children under Six spend Significant Time Visiting | Priority 5 |

V. Blood Lead Level Testing for Children

Children are not required to have their blood tested for lead in order for the home/unit to be considered for the program, however the City of Fort Worth encourages all parents with children under the age of six to have their children's blood tested for lead.

Testing methods shall be by venous blood draw. Families shall be referred to their primary care physician or medical clinic for blood lead testing with laboratory analysis performed.

If the child has been tested for lead, the test result must not be older than 6 months.

Note: If the family agrees to test their child's blood lead level, the test should be conducted before the start of lead-safe work on the home.

VI. Program Limit

Qualified clients and housing units have been allocated an average of \$12,000 for Lead Safe Program repairs, lead funding not to exceed \$20,000 without preapproval. Properties designated as “Historical” by the Texas Historical Commission (THC), houses with extensive lead-based paint hazards and any other special situations may need preapproval for higher limits on a case by case basis, at the sole discretion of the City of Fort Worth. Match Funds (CBGD) have no expenditure limits but must only be used for Lead repairs only.

Housing that receives lead-based paint hazard reduction services can also be allocated up to \$5,000 (approximately \$3,500 per home based on past Program performance) from the Program’s Healthy Homes Supplement to address health and safety hazards.

Note: Healthy Homes Supplement funding is provided on an as-needed basis to address health and safety concerns, but this funding is not guaranteed. Healthy Homes Supplement funding will be applied in order from greatest risk present to lowest risk present at the City’s sole discretion. Healthy Homes Supplement funding cannot be used unless lead hazard control grant funded is expended on lead hazard control interventions.

VII. Program Marketing

The Program’s marketing program will target families with children under the age of 6 years who are in need of lead-based paint hazard control assistance. These efforts will be made through collaboration with local health care providers, community-based organizations, faith-based organizations and other local agencies.

Marketing efforts will be accomplished via presentations and participation in health and housing fairs, media events and coverage, telephone consultations, mass mailings, social media platforms, web-based educational materials, as well as regular attendance of neighborhood meetings throughout the City of Fort Worth. In addition, the City of Fort Worth website has been updated to include information about the Lead Safe Program and has been improved to allow for a completely web-based application process.

Specifically, the Program will target low to moderate income families who meet the child requirement and live in the 76104, 76105, 76106, 76110, and 76111 zip codes. These zip codes represent the City’s Target Area for the Program due to the high concentrations of aging housing stock (built prior to 1978) and significant portions of the population having incomes that are at or below HUD’s defined AMI.

Note: While the City will focus a large amount of the Program’s marketing effort to these specific areas, the Program remains open to any qualified housing unit and/or family within the City limits of Fort Worth that meet all Program qualifications.

VIII. Applications

Referrals to the Program

The City will accept LSP referrals from for-profit and non-profit entities, other City Departments, as well as other local, state and federal entities.

Application Process

- All persons who contact or are referred to the Program will be contacted via telephone, e-mail, mail or in person to conduct an initial consultation. Program Staff will screen the interested person to ensure that they meet the Preliminary Program Qualifications outlined below.
- If after the initial consultation the resident appears to meet the Preliminary Program Qualifications, an application will be provided to the Applicant;
- Applications for the Program will be available in person, e-mail, online or by mail. Should residents experience difficulties in filling out their application, Program Staff are available to schedule an appointment to discuss via phone, email, other telecommunication or by other means to assist the Applicant;
- The complete application consists of:
 - Completed Application Document(s);
 - Eligibility Form;
 - Conflict of Interest Form;
 - Public Information Acknowledgement / Advisory Noise Control Form;
 - Lead Hazard Blood Testing Form;
 - Income Verification Form, gross income calculation
 - Third Party Verification of Income, relevant to HUD policy 2017-05;
 - Proof of Income Form and Approved Documentation;
 - Permission for Inspection and Testing Form; and
 - Release of all Claims & Indemnity Agreement.
- If the Applicant fails to submit a complete application, Program staff will contact to the Applicant detailing the missing information;
- If after 30 days the Applicant has not returned the missing information the application will be denied and a denial letter will be mailed out to the Applicant;
- If an Applicant was denied due to missing information on a previous application, the Applicant may submit a new application with all required documents and certificates. The new application will be processed and services delivered in the order that completed application are received;
- Program Staff will review all completed applications, documentation and certifications to determine if the Applicant is eligible to receive program services;
- All applications will be processed by date received, with the exception of households with children with elevated blood lead levels as detailed within this document- ***please see [Section IV Prioritization of Services](#) for more detailed information;***
- Once the application and supporting documentation has been reviewed and approved / qualified for Program Services, Program Staff will assign and schedule a Lead Hazard Risk Assessment for the client.

Required Documentation

The following documentation is needed in order for the application to be considered “complete”:

- Proof of Ownership - this is shown by a copy of the Tarrant Appraisal District Record to verify the Applicant’s information. If the property is owned by more than one person/entity- all persons/entity must sign the application. All property Owners’ income will be considered as part of the application.
- Tarrant Appraisal District Record to verify if the home is located within the Fort Worth city limits and that the home/unit was built prior to 1978.
- Examples of adequate household income documentation (most recent 2 months is required for Program Income Qualification) are as follows:
 - Paycheck stubs;
 - Social Security or SSI award letter;
 - Retirement, Pension letters;
 - Veteran income documentation such as VA pension or disability award letter(s);
 - Annuities;
 - Child Support;
 - Temporary Assistance for Needy Families (TANF); and/or
 - Food Stamps
 - Completion of third party verification process.
- This above required documentation is considered valid for up to 6 months following its collection. After 6 months, the Applicant will be required to submit updated documentation for the most recent 2 months. Refusal to provide income documentation will be cause for denial from program services.

Denials

Some or all of the following shall result in a denial of Program Services:

- The home/unit is not located in the City of Fort Worth;
- The Applicant does not own the home/unit / cannot prove ownership; or the Applicant cannot provide proof of primary residency;
- The home/unit was built in or after 1978;
- A child under the age of six does not live in the home / visit the home for a significant amount of time, or a woman who is pregnant does not live in the home/unit;
- The household income exceeds LSP income requirements;
- The home/unit requires more than \$5,000 in non-LSP type repairs as determined by Program Staff;
- For Rental Units Only--the rental property does not have a current Certificate of Compliance as required by state and local building codes;

- For Rental Units Only—the Owner does not have or follow HUD Fair Housing Policy;
- For Rental Units Only – the Owner does not agree to a lien on the home/unit for the cost the repairs that will be released upon the Owner renting the units that received services under the Program to families that earn less than 50% of Area Medium Income for Fort Worth;
- Failure to provide a Complete Application within 30 days of the City notifying the Applicant;
- Units located in a floodplain;
- Applicant does not agree to attend the Lead-Safe Workshop for Specialized Cleaning Techniques, On-Going Maintenance, Recognizing Lead Hazards, and Preventing Child Lead Poisoning;
- Properties that contain excessive personal items which prohibit Program Staff’s ability to perform inspections/risk assessments properly as determined by City of Fort Worth; and
- Properties that have participated in the City’s previous lead hazard programs

Approvals

After being initially reviewed, the Program Manager will review the application for final approval. Once approved, the Program Manager will assign the housing unit to a Rehabilitation Technician for a lead-based paint inspection/risk assessment.

Program staff will enter the approval date into the database and send a letter to the Applicant informing them of the approval. The approval letter will detail the inspection process and will inform the Applicant of the Rehabilitation Technician who has been assigned to the home/unit and that staff will be contacting them to schedule an appointment.

Once the appointment is scheduled with the Applicant, the Administrative Assistant will create the file for the Applicant and include the Lead-Safe Program File Checklist, the complete application and all correspondence.

IX. Request for Proposals

The City conducted a Request for Proposals (RFP) for Home Repair Construction Services in early 2020, and for Lead Hazard Risk Assessment Services in late 2019. The results of these competitive RFPs were professional Job Order Contracts (agreements) that offer an initial one (1) year term with four (4) options to renew for the list of contractors below. All LSP affiliated contractors will be partnered with the City

X. Lead Safety Inspection and Lead Safety Control Measures

Preliminary Lead-Based Paint Inspection / Risk Assessment Process

All approved applications will be scheduled for a lead-based paint inspection/risk assessment to determine if a lead hazard exists relevant to HUD policy 2013-01.

The Program Staff/Contractor will perform the inspection/risk assessment according to all federal, state, local and Program guidelines. During the inspection, a brochure from the Environmental Protection Agency (EPA) will also be given to the property Owner and Occupant at this time.

Results of the lead-based paint inspection/risk assessment will be provided to the Applicant and Occupants in writing. Program Staff will inform the Applicant about the next step.

If the risk assessment indicates that a lead hazard exists, Program Staff will start the process to complete the HUD Environmental Review. Lead hazard reduction measures can only begin on the home/unit after the complete environmental review process is completed; and there is a "Finding of No Significant Impact."

If the risk assessment report shows that a lead hazard does not exist, the applicant will be notified and the file will be closed. Ineligible to receive Healthy Homes Supplemental funding if no Lead Paint Hazards identified.

Determination of Lead Safety Control Measures Process

The CFW staff shall develop a work order utilizing the lead-based paint inspection/risk assessment reports. Program Staff shall prepare a detailed drawing of the housing unit that will identify the location of XRF tests, dust wipes and soil samples.

This detailed work order shall specify the lead hazard controls that will be performed on the housing unit. Program Staff will then determine and detail the lead reduction measures to be used and whether components such as windows, doors, flooring, soil, sod and cabinets that will be replaced throughout the property.

Notes:

- ***Neighborly software will be used to create the work order.***
- ***The Lead-Safe Program Manager shall review the completed work order and once approved will assign it to a Contractor.***
- ***No appliances throughout the home will be moved, removed or replaced.***

XI. Performing Lead Safety Control Measures

Initial Meeting with the Applicant

Once a completed work order is finalized, Program Staff will prepare an information package for the Applicant that shall contain the following:

- A copy of the completed work order;
- The process of how the work will be performed and the time it will take;

- Temporary Relocation Contract for the Occupants if hardship criteria is met;
- The contract requiring the Applicant to attend Lead-Safe Workshop for Specialized Cleaning Techniques, On-Going Maintenance, Recognizing Lead Hazards, and Preventing Child Lead Poisoning;
- The contract with the Applicant so that the work can be performed on the property; and
- Any other pertinent documentation.

Program Staff will schedule a meeting with the Applicant to go over the items listed above. No additional work will be added to the completed work order once completed.

The Applicant has the right to cancel the work at any time. This will be included in their contract. If the homeowner or landlord decides to cancel the work, Program Staff will mail a letter to the Applicant acknowledging the request and the file will be closed.

Documents Needed to Begin Lead Safety Work

- Completed and approved Application;
- Environmental Review (Tier2) Process is completed by NSD Planning Staff in HEROS;
- All contracts with the Applicant must be signed by all parties to begin work on the home/unit; and
- The Applicant must have completed the Lead-Safe Workshop for Specialized Cleaning Techniques, On-Going Maintenance, Recognizing Lead Hazards, and Preventing Child Lead Poisoning.

Temporary Relocation During Lead Safety Work for Owner Occupied Single Family Homes

It may be necessary to relocate the occupants of the home to protect the health and safety of the occupants during the Lead Interim Work. Program Staff will make the determination if temporary relocation of the home's/unit's occupants is necessary. This will be offered only if hardship criteria is met:

- A) Health Issues/disabilities that need accommodations
- B) No family in the area to assist
- C) Family with children that need accommodations
- D) Cannot afford to pay relocation fees upfront

Temporary Relocation During Lead Safety Work for Rental Property

It may be necessary to relocate the occupants of the home to protect the health and safety of the occupants during the Lead Interim Work. Program Staff will make the determination if temporary relocation of the home/unit occupants is necessary.

The landlord shall pay for all temporary relocation of occupants. For multi-unit housing, the property Owner will be required to find a vacant unit in the complex and have it certified as lead-safe and can use this as temporary housing. This vacant, lead-safe unit

will be used to temporarily relocate the property's tenants while work is being done on their units.

Performing the Lead Safety Work

During the pre-construction walk through the work order will be reviewed by the Contractor and the Applicant, the time to complete the work and the Applicant will be able to select colors for materials to be used from a pre-approved list. A Notice to Proceed will be sent to the Contractor after the Work Order is fully executed and a release number is generated by the City. The Notice to Proceed and the Contract will be placed in the Applicant's file.

Once the work start date has been approved by the Applicant, the Contractor and Program Staff, three copies of the work order will be sent to Contractor to be signed.

The Work Order will contain at least the following terms:

- Work Schedule;
- Payment Schedule; and
- Owner's material selection

Once the Work Order is executed, Program Staff will meet with the Contractor and the Applicant at a Pre-Construction Meeting to go over the work and work schedule.

Program staff will inspect and document on-site compliance inspection of all work conducted on LSP units to ensure strict compliance with all local, state and federal rules and authorities. Once Program Staff confirms adequate completion of all items, the unit will be released back to the Applicant. After clearance the unit can be re-occupied by occupants.

Lead Hazard Control Process

A Notice to Proceed will be sent to the Contractor after the Work Order is fully executed and a release number is generated by City. The Notice to Proceed and the Contract will be placed in the Applicant's file

Clearance Examinations

CFW Rehabilitation Specialists will perform all clearance tests (dust wipe sample collection) to HUD-mandated specifications. Experience with Fort Worth's contractors indicates that most units pass their first clearance test; if the unit fails two clearance tests, the contractor is responsible for paying for all further clearance tests, and retainage will be held until the unit passes clearance. The timeline for receiving test reports back from the lab is generally 24-48 hours, weather permitting.

XII. Performing Healthy Homes Inspections

Healthy Homes Inspection (HHI) will be completed on all eligible units that contain lead-based paint hazards. All approved units will undergo a Healthy Homes inspection to identify any of the 29 housing hazards rated by HUD. Units that do not have lead based paint hazards and lead hazard funding is not expending are ineligible to receive Healthy Homes Supplemental funding.

General HHI principles guiding the assessment will focus on elimination of hazards created by moisture, excessive cold or heat, or carbon monoxide/gas combustion and mechanical deficiencies. Physical and structural hazards that could cause falls will also be emphasized.

This tool will be used to establish priorities of items to be addressed or repaired, including elements such as pest management and ventilation. CFW staff will apply the “holistic” approach when assessing housing units for HHI assistance. In addition to items mentioned above, this approach can include testing for gas leaks, investigation of water leaks, identification of fire hazards or air infiltration locations, electrical hazards, potential outdated code compliance aspects of HVAC, water heater or other mechanical systems, or location of allowable urgent structural deficiencies that affect the overall safety of the home.

Final prioritization of hazards will be based on a combination of the prioritization from the HHI tool, the urgency of the health/safety issue, and the cost-effectiveness of potential repairs.

Final contractor work orders will be developed based on the highest priority needs determined by the rehabilitation specialist. This process may be modified, streamlined or adapted based on the City’s current and previous experience with preparation of limited-cost repair specifications from the PRP and Weatherization programs, and based on experience with initial HHS unit repairs.

Determination of Measures to be completed

The CFW staff shall develop a work order utilizing the HHI information through Neighborly Software. The Lead-Safe Program Manager shall review the completed work order and once approved will assign it to a Contractor.