



CITY OF CLEVELAND
Mayor Justin M. Bibb

Report to the Lead-Safe Advisory Board

Lead-Safe Programs

March 14, 2024



Lead Safe Living Environments Programming

Cleveland's Initial Approach

Regulation, Repair, Incentives

Lead Safe Certificates (B&H)

- Command & control
- Highly technical
- Reliance on licensed private sector
- Goal: compliance

Lead Hazard Control (PH)

- Secondary Prevention
- Lead poisoning causes investigation & assessment

Housing Repair & Targeted Remediation (CD)

- Income-eligible remediation
 - owners & tenants
- Home Repair
- Glenville

ARPA Funds (Coalition)

- Home repair grants
- Certificate Incentives
- Workforce development
- Emergency housing
- Screening & testing



Lead Safe Living Environments Programming

Results of Cleveland's Initial Approach

Lead Safe Certificates (B&H)

- Compliance spikes:
 - Rolling compliance deadlines
 - Residents First
- Renewal lags (37%)
- Low compliance rates 1-3 units

Lead Hazard Control (PH)

- Steady LHCO numbers
- Unchanging poisoning case numbers
- Failure to comply LHCO litigation – 50 homeowners

Housing Repair & Targeted Remediation (CD)

- Backlogs
- Contractor shortages
- Technology

ARPA Funds (Coalition)

- Certificate Incentives started exceeding expectations in Q4 2023



Lead Safe Living Environments Programming

Time to Re-Tool for Greater Effectiveness

City as Regulatory Point of Contact; Small Landlord Assistance Center

Empower City Teams

- Residents First
- Accela
- Achievable & realistic performance metrics for a young, major regulatory program

Midstream User Assessments

- Accela data & analysis
- Regulated Public POV
- Public Engagement

Draft Administrative Assets

- Certificate Application
- Exemption Application
- Affidavit Application
- Regulatory Guidance

Small Landlord Compliance Center

- Outreach
- Technical Assistance
- Compliance Schedules
- Incentives, Grants, Loans Navigation



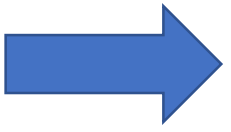
Lead Safe Living Environments Programming

Defining Midstream Inputs, Outputs & Outcomes

Assessing our service provision to achieve environmental justice

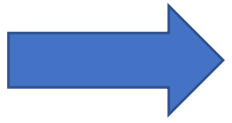
Create End User Feedback Loops

- Talk to owners & landlords
- Talk to tenants
- Talk to lead-safe professionals
- Talk to unions



Assess Accela Data & Analyze Compliance Unit Use

- Number of interactions
- Form abandonment & completion rates
- User friendliness
- Be prepared to continuously adjust



Close Gaps

- Motivate action
- Build trust
- Engage more effectively





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Cleveland Department of Building & Housing

March 14, 2024



Lead Safe Certificate Program

Moving from compliance rates to effectiveness

Can we lower user experience barriers to achieving lead safe living environments?

Compliance Measure	
2-year certificates current	4,756
2-year certificate expired	1,871
20-year exemptions	121
Rental units lead safe	15,300 (2 yr) 3,822 (20 yr)
Rental units certified & expired	6,866
Total rental registry units	94,862

Midstream User Measurements	
1-3 Family Lead Compliance Unit Launch & Engagement	
New compliance schedules/guidance document	
Small landlord incentive/grant/loan referrals	



ODOD Lead Safe Ohio Funding

\$4.9 million direct award to the City to be deployed in Q2 2024

- Window and Door incentive program open to all landlords
- Administered by CHN Housing Partners
- Will help close funding gaps from other programs and help push units closer to a 20-year compliance standard.



Challenges to Lead Safe Enforcement

An increasing number of reports submitted are rejected suggesting a potential flaw in the program, the need for additional training for lead workers, and the need for clear guidance and standardized reporting protocols.

611

Number of failed reports since program inception

Common Reasons:

- Missing or incomplete Report/ attachments (Lab sheets, maps, chain of custody, photos, licenses)
- Unsigned Documents
- Report Timing (submitted past the 90-day period)
- Wrong type of report submitted
- Blurry or photos or documents
- Expired licenses
- Incorrect number of samples, reports submitted
- Failing samples submitted
- Excluded Component Table not submitted
- Narrative of Property not submitted
- XRF report not from the XRF instrument
- Incomplete xrf report (not all painted surfaces tested)

Overarching concern

Lead clearance exams conducted without a risk assessment are not necessarily a reflection of general lead safety. A lead risk assessment is needed to identify concerns that must be addressed before a clearance exam occurs.

Fundamental Question

Are the city's efforts reducing lead poisoning in children? This will be studied and reported going forward.



New 1-3 Family Lead Compliance Unit

Creates an incentive for smaller landlords to work with the city to gain compliance

Why is it needed?

- Lowest Lead Safe compliance rates in 1-3 family units
- Historic disinvestment of units
- Lack of funds to make repairs for many small investors

Targeted Outreach

- Proactive outreach to non-compliant 1-3 family rental properties
- Community Events
- Earned media/website push

Carrots vs. Sticks

- **Stalls Prosecution**
- **Free Lead Risk Assessment**
- **Link to resources: HUD grant; ODOD funds**



New 1-3 Family Lead Safe Compliance Unit

Only 12% of single-family and 9% of two-family rentals have obtained lead safe compliance compared to 44% compliance for 10+ unit buildings.

How will it work?

In addition to investigating complaints, will assist small landlords by

- Providing a lead risk assessment as part of a rental healthy home inspection process; forestalling prosecution for non-compliance while actively participating in the program.
- Provide guidance and assistance in filling out applications, forms, and any other required submissions.
- Resolution of certificate/exemption disputes.
- Will assist in getting unit ready to pass a clearance exam which will be handled by outside vendors of the landlord's choosing.



Lead Safe Certificate Program

Residents First will change the way lack of compliance is addressed

- Civil tickets will be used starting in May of 2024
- New Accela Lead App will launch in Q2 2024
- City's open data portal will go live in Q2 and allow for easier public access of Lead Safe and all other Building and Housing information



Lead Safe Certificate Program

Regulatory Guidance for Landlords

Public Feedback Due: April 26, 2024

City is issuing a draft regulatory guidance document for landlords subject to the City of Cleveland's Lead Safe Certification Law.

Purposes:

- Clarify 2-year certificate and 20-year exemption considerations;
- Address how the City relies on HUD Guidelines and state law in processing applications;
- Define necessary steps and communication between owner/landlord and lead safe professionals to work toward compliance prior to certificate/exemption application submission;
- Clearly define the review process used by the City for application deficiencies, denial, and approval over time.





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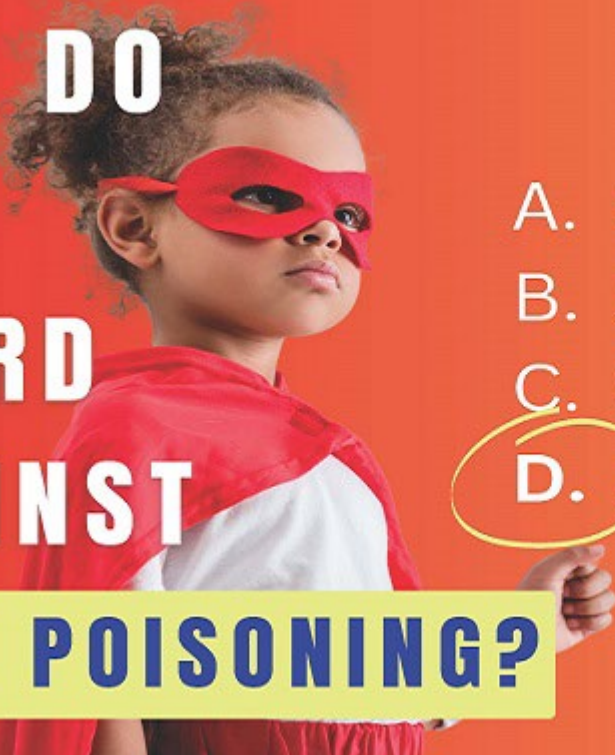
Cleveland Department of Public Health

March 14, 2024



Cleveland Department of Public Health

Investigating the source of Lead Poisoning after a child has been poisoned.



HOW DO YOU GUARD AGAINST LEAD POISONING?

cdph
Cleveland Department of Public Health

Lead Safe Living

- A. Get the facts.
- B. Get your home tested.
- C. Get your child tested.
- D. All of the above.**

216-263-LEAD (5323)
clevelandhealth.org



Cleveland Department of Public Health

Investigating the source of Lead Poisoning after a child has been poisoned.

Investigation:

316

Number of children with Blood Lead Level >10 mcg/dl in 2023.



A container of toys in the Wheelers' rental home photographed by a Cleveland Department of Health inspector.



Cleveland Department of Public Health

Investigating the source of Lead Poisoning after a child has been poisoned.

1,359

Number of children with
Blood Lead Level >3.5 –
9.9 mcg/dl in 2023.

Outreach:



Cleveland Department of Public Health

Investigating the source of Lead Poisoning after a child has been poisoned.

658 (36 releases)

Lead Hazard Control Order Affidavits filed with Cuyahoga County Recorder.

163

Lead Hazard Control Orders that have been closed for compliance.

Compliance:





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Cleveland Department of Community Development

March 14, 2024



Department of Community Development

Lead Hazard Control Grants

- All painted surfaces in the interior and exterior of the structure will be inspected visually to determine the condition of the painted surface. The inspector will use a handheld machine to determine presence of any lead-based paint.
- Eligibility:
 - Home must be in the City of Cleveland and built before 1978
 - A child under age six (6) must live in or visit the home 20+ hours each week, or a pregnant woman must live in the home
 - Lead hazards must be identified (all eligible families get a free lead inspection)
 - The family living in the home must qualify as low-income
 - Property taxes must be current or the property owner must be on an approved payment plan



Department of Community Development

Lead Hazard Control Grants

- Process:
 - An application is received from the homeowner or tenant
 - An intake specialist works with the applicant to obtain the necessary documents required to determine eligibility
 - If eligible, a CD inspector will perform a lead/inspection risk assessment (LIRA) on painted interior and exterior surfaces. This is used to determine the scope of the work.
 - The specifications are prepared and given to the assigned contractor to schedule the job.
 - Once started, interior jobs can take up to 10 days, exterior may take longer based on the weather. The family is given a relocation allowance while the interior work is being completed.
 - Once completed, a CD inspector will inspect the job, provide a clearance and provide notices to B & H and DPH (if applicable)



Department of Community Development

Lead Grants Current Status

Intake	14 applications in process
Citywide	<ul style="list-style-type: none">• 30 Jobs completed in 2023• 4 Jobs completed in 2024• 92 applications on hand (intake, documents updated, ERs, pending contractor assignment)• 1 job under construction
Glenville	<ul style="list-style-type: none">• 8 Jobs completed in 2023• 0 jobs completed in 2024• 67 applications on hand (intake, documents updated, ERs, pending contractor assignment)• 2 jobs pending start dates

Challenges

- Staffing
 - Bureau Chief
 - Inspectors
 - Compliance staff
 - Intake Staff
- Contractor Shortage
- Backlog in Environmental Reviews*
- Technology (Neighborly)

* An environmental review is the process of reviewing a project and its potential environmental impacts to determine whether it meets federal, state, and local environmental standards. The environmental review process is required for all HUD-assisted projects to ensure that the proposed project does not negatively impact the surrounding environment and that the property site itself will not have an adverse environmental or health effect on end users.



Department of Community Development

In Progress

- Fixed pricing (vs. bidding)
- Increased Recruitment of Contractors
 - Outreach to the CDCs for their contractor lists, increased community engagement at trade shows/events, posting on social media
 - Assess pollution insurance on a job by job threshold
- Implementation Vendor RFP (closes 4/15/2024)
- Outsourcing Environmental Reviews
- Increase Intake staffing and CES
 - Bureau Chief Position closed on 3/12/2024
 - Chief will be posted once BC is hired and onboard
 - 3 offers made in intake staff
 - 4 positions posted for CES
- Re-distribution of work to other inspector staff
- Simplify the Lead Application
- Working on an RFP with ITS to replace the neighborly system, expand Power BI usage in the interim.

**ARE YOU A CONTRACTOR
LOOKING FOR MORE JOBS?**

**BECOME A
CONTRACTOR WITH THE
CITY OF CLEVELAND**

*We have various home repair projects
that we are in need of contractors for*

Home Repair Seminars

Held every Wednesday at 1:00 in
City Hall, learn what it means to
be a contractor for the City and
how to become a Lead
Abatement Contractor

*With programs ranging from the
renovation of business storefronts to the
management of the lead hazard
reduction in all projects, Community
Development seeks to make Cleveland a
better place to live, work, and invest.*

Contact Us:

- 📞 123-456-7890
- ✉️ mjohnstone@clevelandohio.gov
- 📍 601 Lakeside Ave

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MAYOR JUSTIN M. BIBB
COMMUNITY DEVELOPMENT



Department of Community Development

Mt. Sinai / Enterprise Lead-Safe Cleveland Coalition

Funds: \$13M ARPA Treasury

Dates: July 1, 2022 to June 30, 2026

Services:

- *Grants for property owners for lead-safe home repair*
- *Lead-safe certification incentives*
- *Emergency housing assistance for households facing housing insecurities due to lead*
- *Workforce development*
- *Screening and testing*



Department of Community Development
Mt. Sinai / Enterprise Lead-Safe Cleveland Coalition

Program Performance

*Lead-safe certification
incentives*

2531 (as of Q4 2023)

450 (exp. Q1 2024)



Department of Community Development

Mt. Sinai / Enterprise Lead-Safe Cleveland Coalition -- Program Performance

Milestones	Q3 2023		Q4 2023		Q1 2024	
	Reported	Expected	Reported	Expected	Reported	Expected
Home repair grants	0	75	0	50	0	20
Incentives	1876	2100	655	150	318 (exp 450)	150
Workforce						
Persons trained	0	8	0	8	0	8
Residents served	0	88	0	60	0	30
Emergency housing (households)	RFQ in progress	Provider selection, ramp	RFQ draft, 0	RFQ released, 20 households	RFQ released week of 3/11	40
Screening & testing (children screened & tested)	RFQ in progress	Provider selection, ramp	0	RFQ released, 25	RFQ release early Q2	30

Department of Community Development
Mt. Sinai / Enterprise Lead-Safe Cleveland Coalition

Budget Status / Q1 2024 Check-in

Total amount received from City	\$6,414,666
Total costs incurred to date	\$2,300,000
Funds on hand	\$4,114,666
Costs incurred this reporting period	\$350,000

