November 21, 2017

Regulations Division
Office of Lead Hazard, Control and Healthy Homes
U.S. Department of Housing and Urban Development
451 7th Street SW
Washington, DC 20410-0001

Re: [Docket No. FR-6049-N-01] Drafting a New Federal Strategy to Reduce Lead Exposures and Impacts: Request for Information

To Whom It May Concern:

On behalf of the National Association of Housing and Redevelopment Officials (NAHRO), I am pleased to offer the following comments in response to the request for information (FR-6049-N-01) entitled “Drafting a New Federal Strategy to Reduce Lead Exposures and Impacts: Request for Information,” published in the Federal Register on October 24, 2017. Formed in 1933, NAHRO represents over 20,000 individual and agency members. Collectively, our membership manages over 970,000 public housing units, or approximately 83 percent of the entire public housing inventory, as well as 1.7 million Housing Choice Vouchers. Many of NAHRO’s members are also involved in the administration of federal funding through Community Planning and Development programs. NAHRO works to support policies that help housing authorities best meet the needs of their local communities.

NAHRO and its members understand and appreciate the importance of the work being completed by the President’s Task Force on Environmental Health Risks and Safety Risks to Children. NAHRO and its members strongly support the goal of expanding efforts to eliminate childhood lead poisoning in the United States and remediating any lead-based paint hazards that may exist within HUD-assisted housing units, especially those serving children.

NAHRO and its members remain steadfast in ensuring that children in HUD-assisted housing are not exposed to lead-based hazards, and PHAs have been successful over the years in minimizing lead-based hazards from their properties. A joint report by the Department of Housing and Urban Development (HUD) and the Centers for Disease Control (CDC) released in September of 2016 in the American Journal of Public Health found that the average amount of potentially harmful lead in the blood of children in low-income families living in federally assisted housing is significantly lower than comparable children not living in federally supported housing.¹ According to the report, “children living in federally supported housing have approximately 20 percent lower blood lead levels on average than similar children in low-income families living in homes where there is no federal assistance.”


Carl S. Richie, Jr., NCC, NAHRO Fellow, President; Sunny Shaw, PHM, CME, Senior Vice President; Andy Rodriguez, Vice President-Member Services; Mark Thiele, CS-PHM, CME, CMVO, NCC, Vice President-Community Revitalization and Development; Marsha J. Parham, CME, Vice President-Professional Development; Henrietta Snipes, NCC, Vice President-Commissioners; John T. Mahon, PHM, Vice President-Housing; Adrianne Todman, Chief Executive Officer.
Although studies show that PHAs have been successful in limiting childhood exposure to lead hazards, there are still obstacles that can impede PHAs' abilities in fully eradicating lead-hazard exposure to residents. The main obstacle many PHAs face is chronic underfunding. The public housing inventory faces a mounting capital needs backlog, but Capital Fund appropriations continue to lag dangerously behind accruing modernization needs. At the same time, funding for operations has endured deep cuts, forcing PHAs to forego critical maintenance functions and further jeopardizing the long term sustainability of many properties. Each year, PHAs receive enough funding to address only about half of their newly occurring physical needs. Recent unfunded regulations from HUD have increased PHAs' challenges in meeting the needs of their residents and properties. This chronic underfunding has a huge impact on the health and safety of residents who live in public housing. Adequate funding requests for the Capital Fund is tantamount for insuring PHAs can provide lead-hazard reduction as quickly and as thoroughly as possible.

NAHRO was extremely disappointed to see that HUD's FY 2018 budget request included a significant decrease in Capital Fund dollars. If HUD is genuinely interested in helping PHAs properly eradicate lead-hazard exposure to children living in federally-assisted housing, HUD needs to ensure it requests necessary and appropriate funding levels from Congress for the Capital Fund. Appropriate funding requests would be a strong indicator to Congress and all interested stakeholders that HUD is serious about eradicating lead-hazard.

NAHRO was pleased to see that Congress appropriated an additional $25 million in FY 2017 to the Capital Fund to specifically cover costs associated with lead-based paint abatement. Although Congress has appropriated this money to HUD, funding has yet to reach PHAs. The Senate Appropriations Committee included language in their FY 2018 Senate Appropriations Committee report instructing HUD's Office of Public Housing Investment (OPHI) to work with HUD's Office of Lead Hazard Control and Healthy Homes to create a Notice of Funding Availability (NOFA) for FY 2017 grant funding that meets the unique needs of PHAs facing lead-based paint risks. This language was published over four months ago, yet PHAs have yet to see this NOFA. Considering HUD and the President's Task Force are rightly concerned with quick and thorough lead-hazard abatement and remediation, NAHRO is disappointed that this funding has not yet been made to PHAs. NAHRO urges HUD to make this NOFA publically available as quickly as possible.

As always, NAHRO is appreciative of the opportunity to comment on this important matter. NAHRO and its members understand the importance of eradicating lead-based hazards to children in federally-assisted housing, however, it is critical that any action takes into account the funding challenges faced by PHAs. The Operating Fund has been at historic lows over the past several years, and the Capital Fund is funded at only half of its annual rate of accrual, and has been for years. NAHRO urges HUD to be a strong advocate for necessary and appropriate funding for PHAs to ensure they can best help work toward eradicating lead-based hazard exposure to children.

Thank you,

Eric Oberdorfer
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