



October 8, 2018

Mary Bray
Housing Resources Commission
Dept. of Administration
One Capitol Hill
Providence, RI 02908

Re: Title 860 RICR-00-00-4— Housing Resources Commission.
Rules and Regulations Governing the State Lead Hazard Reduction Program

Proposed Amendment Comments

Dear Ms. Bray:

The Green & Healthy Homes Initiative (GHHI) Rhode Island writes to offer comments and recommendations on proposed amendment of Title 860 RICR-00-00-4 regarding Rules and Regulations Governing the State Lead Hazard Reduction Program. GHHI is a 501(c) (3) non-profit organization whose mission is to break the link between unhealthy families and unhealthy homes. GHHI maintains a Providence office and provides technical assistance, capacity building, education and direct services in Rhode Island. GHHI also works in 32 cities and in 20 states across the country.

GHHI provides the following comments and recommendations related to the Department's proposed rulemaking:

1. **§5(a) Reservations**

"A yearly set aside of \$200,000 will be earmarked specifically for homes for foster families and adoptive families. The LHRP will rely on the Department of Children, Youth and Families to identify the homes needing lead hazard reduction assistance. Initial inspections will be paid from these funds..."

GHHI recommends that all Department of Children, Youth, and Families initial inspections to identify families under this amendment includes specific wording on inspection methods to be used such as lead risk assessments and lead dust clearance sampling. It should also be included that these methods will integrate best practices for non-abatement lead dust testing under EPA's regulations and HUD's Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing;

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Ms. Mary Bray Letter
October 8, 2018
Page Two

2. **§4.4 Regulations**

B. Allocation of Funds

1. Eligible Owners section A

Eligibility for LHRP funds is primarily for private owners of owner occupied and/or rental housing units. Preference is given to units solely owned by an individual(s) or a nonprofit organization. Properties placed in receivership pursuant to court order due to lead hazards and foreclosed properties held by the Corporation are eligible for funding. Eligibility may also be considered for Community Development Corporations, Limited Liability Companies and State-owned properties (such as group homes).

As part of the primary purpose of the LHRP to eliminate lead hazards in properties throughout the state; GHHI recommends that if including “state-owned properties (such as group homes) under eligible owners; it should specify a prioritization of those state-owned properties that provide services to young children.

Thank you for your consideration of these comments and recommendations.

Sincerely,

Ruth Ann Norton

President and CEO