

Healthy Homes Production Program (HHP)
2022
Policies and Procedures
As of August 16, 2022

Management Plan

The City of Columbus, through its Department of Development, Housing Division will continue to address health and safety in housing in compliance with the Office of Lead Hazard Control and Healthy Homes. The Healthy Homes Program (HHP)'s mission is to protect the most vulnerable families in the community from housing related hazards by preserving affordable housing, improving housing conditions, and improving neighborhoods in Columbus, Ohio.

HHP will create affordable safe, healthy housing units, and educate property owners and occupants in how to live in a safe and healthy environment. HHP will offer an average of \$7,500 per unit for healthy housing repair activities. HHP will complete 159 healthy housing units under a HHP grant with funds spent of \$2,000,000. All work will be performed by licensed contractors. The HHP will coordinate training and education to build awareness among occupants, owners, contractors/workers, and the public in healthy housing practices.

The Program Manager and Housing Rehabilitation Technician will be hired within 60 days from grant start-up. The Project Director, Relocation Specialist, and Fiscal staff are already hired and working with the Lead Hazard Reduction Demonstration grant. The Project Director will manage the grant start-up process until the Program Manager is hired and supervise both the PM and Housing Rehabilitation Technician (HRT). The Program Manager (PM) will oversee the day-to-day management duties related to the funds provided from HUD in the amount of \$2,000,000. The PM will conduct such activities as: data collection and entry, reporting, oversight and participation in the workflow from enrollment, environmental/historic reviews, bidding and temporary relocation through clearance testing. PM will coordinate work task with the HRT. The PM will also be involved in other administrative duties. The HHP team also includes two (2) Relocation Specialists that will coordinate all temporary relocation and complete income eligibility for HHP. A Property Maintenance Inspector is part of the HHP team in order to complete Decent Safe & Sanitary (DS&S) inspections on properties coming through the program.

Selection of Sub-recipients and Contractors

The Contractors selected for each project will be State of Ohio Renovating, Repair, and Painting (RRP) Certified and or State of Ohio licensed Radon Contractors. They must meet the City of Columbus HHP program selection criteria process which includes: liability insurance, lead licensing and certification (if applicable), RRP Certification, self-report for Section 3 requirements and abide by MBE, WBE, and EEO policies and requirements of the City of Columbus, State of Ohio, and the Federal Government (registered with SAM.gov), and Home Improvement Contractor (HIC) license. A

General Contractor license will be accepted in place of the HIC license. Outreach is done by giving out flyers at neighborhood events in order to attract new contractors. Flyers are also provided to the training provider to distribute to anyone taking training with their company. New contractors are required to complete an application to be a part of the bidding process under the HHP. Once the contractor is on-board with HHP they are put on a rotating bid list in order to bid projects. The Radon Inspector) vendor will be selected by responsive bids from an Invitation to Bid (ITB). All vendors must sign a contract yearly with the City of Columbus in order to receive any funding.

The Contractors must abide by the written contract signed by the owner and the contractor. Consequences of not abiding by the contract could be suspension, termination from the HHP, and/or removal from a project. Each contractor completing work specifications will be graded at the end of each project. The grading system will be from A-D. A is the best possible grade and D is the worst possible grade. These grades will be used when communicating with the owner about selection of a contractor and will also help the HHP monitor the contractors reliability, time management, ethics, safety, following program and state guidelines, and workmanship. In cases of dispute, HHP shall, within a reasonable time, make decisions on all claims of the Contractor and/or Owner and on all other matters relating the execution and progress of the work or the interpretation of the contract documents. The HHP's decision in matters relating to the contract will be final.

Eligible Properties and Priorities

Those contractors and subcontractors who have performed work/ received bids for the City of Columbus' Housing Division/HHP program within the last 18 months are **not** eligible to apply.

The HHP Program Manager (PM) will be responsible for overseeing the outreach, recruitment and enrollment for HHP. Applications will come in from referrals from CPH, neighbors, contractors, and outreach events. The PM will receive all applications and review them for completeness. Once the application is complete the PM will then provide them to the PD for approval and signature proceeding to the next step in the process. The PM will also manage all affirmative marketing and outreach efforts to those most likely to benefit from the program. The PM will implement and monitor the following enrollment strategy with a goal of having all 180 units enrolled by quarter twelve (12) of the performance period.

The general target area for HHP is the City of Columbus corporation limits. HHP will seek to find and conduct outreach in high risk areas within the general target area through partnering with local agencies.

- **Current Homeowner Services Wait List:** All those on the current pipeline of eligible units on the Homeowner Services waitlist will be sent out an application to apply first.

- **Outreach Events:** Units will also be recruited and enrolled through the outreach events HHP will participate in. HHP will give information about our program and educate the community about healthy housing hazards and safety in their homes. These events will include the Rise up Cbus events throughout the year.
- **Columbus Public Health (CPH) outreach collaboration:** To enhance the capacity and efficiency of the program, CPH will provide general and targeted community outreach to secure enrollment of units, and promote safe, healthy housing and lifestyles.
- **Previous Participants:** Units will be recruited and enrolled through property owners who have participated with Lead Safe Columbus (LSC) previously. We will use one or more of the following means - word of mouth, email, door to door canvassing, referrals from previous or current contractors, and advertising in community newspapers.

The following unit qualifications and priorities have been established for healthy homes activities for 159 units: All HHP units will be:

1. Within the City of Columbus corporate limits with priority given as listed below.
2. Single family (1-3 unit buildings) or multifamily (4 or more unit buildings) where at least 51% of the floor space of the project is used for residential purposes.
3. Property must have active insurance coverage (Flood insurance if located in a floodplain).
4. Total household income, at or below maximum per household size.
5. Mortgage and property taxes must be paid current.
6. No municipal, state, or federal liens.

Priority 1: Units occupied with vulnerable residents: children under six years of age, elderly (62 years and over), and disabled.

Priority 2: Units built prior to 1978.

Priority 3: Owner Occupied units with no vulnerable residents.

Priority 4: Tenant-occupied rental units in which there are no vulnerable residents living.

Priority 5: Vacant single and multi-family rental units (owners will agree in writing to keep rents affordable for three (3) years, give priority to vulnerable residents, and make the property available for referral by the City of Columbus Relocation Office as a safe unit).

Income Eligibility: An HHP eligible applicant must be the owner on record of the property, applying as owner occupant or owner of rental property applying on behalf of the tenant occupied or vacant units.

For all occupied units, the occupant must be at or below 80% AMI (Area Median Income) (calculated using Annual income as defined in 24 CFR 5.609, referred to as "Part 5 annual income").

Relocation Specialist will determine income eligibility every 6 months by collecting supporting documentation for household income.

All applications will be reviewed by HHP Program Manager for completeness and eligibility. A site visit will be scheduled for a feasibility inspection of the property. The feasibility inspection will be conducted by the Rehabilitation Technician. If the unit is found feasible for healthy homes activities, information such as: family, size, occupant income verification, verification of property insurance, etc. will be gathered in order to qualify the applicant/occupant.

Additional Applicant/Grantee Obligations

At the time of submitting an application for funding, all owners must agree to the following:

A Property Maintenance Inspector will inspect to ensure that the property meets decent, safe and sanitary (DS&S) conditions. Rehabilitation work that is outside the scope of eligible healthy homes program activities and is required in order to meet DS&S standards must be secured with private or public funds and be completed before or in conjunction with the healthy homes work. For vacant/tenant occupied units, the owner must agree to give priority to renting to low /moderate income families.

The owner must allow a radon test and healthy homes assessment to be conducted by a State certified Radon Tester Columbus Public Health. Work specifications must be approved by HHP staff prior to the bidding process. With the assistance of HHP, the owner must assign a binding contract with a licensed/certified contractor. The contractor must carry adequate liability insurance and bonding and provide to HHP evidence of insurance and licenses that are current and must be kept on file. HHP will exercise oversight of the bid process, including posting bids, opening bids, and conducting joint review of bids with the property owner. Work specifications and contact information for each unit that is ready for bid will be will be uploaded to the online bidding portal, Bid Express. Each unit will have five (5) bid offers sent out to five (5) different contractors. This will be done by the HHP's HRT or PM. If there are no responsive bids with the first round of bids HHP would then send the bid out to the next 5 contractors on the rotating bid list. This will be done by the HHP's HRT. Contractors will be given 7 to 14 days to look at the units and return their bid prices for each unit to Bid Express. Property owner and HHP will make the final approval of the contractor selected based on the lowest and/or best bid for each individual unit, based on need and the project details. It is possible to have a single contractor selected for each unit. HHP and owner reserve the right to reject any or all bids. Other factors such as contractor work history, current workload, capacity to complete the project and available start date may be taken into consideration when selecting a contractor.

The owner must allow a final inspection after work is completed. The owner must participate in ongoing, post project completion monitoring of the property in accordance with the following guidelines: (1) Owner must sign a Monitoring and Maintenance Plan. (2) Conduct annual self-verification in tenant occupied properties showing proof of giving priority to renting to households with incomes at or below 80% Area Median Income (AMI) (as established by HUD). The owner may be required to participate in education initiatives conducted through the City's Healthy Homes Program. These may

include tenant education, homeowner education or property management education. Any non-compliance, as determined by the HHP, of the previously stated obligations, policies or procedures, the Grant Agreement or the Healthy Homes Contract, will constitute an element of default. In such cases re-payment in full may be required or contracted.

Columbus Public Health will be responsible for conducting the Healthy Home Assessments for eligible units. CPH has over fifteen (15) years of experience conducting comprehensive Healthy Home Assessments, including eight (8) years under HUD HH funding although not using the HHRS. CPH staff will have completed NCHH HHRS training prior to starting assessment work under the grant. CPH, in consultation with the grant program manager, will oversee Healthy Homes Assessments conducted by Healthy Homes Assessors certified in HHRS. All 14 hazards will be assessed and risks weighed using the Healthy Homes Rating System. Hazards that are rated Class 1-4 and are likely to cause death or injury will be identified. Of the identified hazards, repairs will focus on radon hazards, followed by other hazards. Other hazards will be considered on a case-by-case basis as funding allows and referred to partners if not eligible under the HUD grant. A State Licensed Radon Tester will conduct Radon testing in all properties except those that have active radon systems in place (determined by CPH's HHRS Assessment) under the HHP grant. State Licensed/Certified Contractors will be used for radon mitigation. The Environmental Protection Agency (EPA) has set the Action level at 4 pCi/L (picocuries of radon per liter of air). At this level or higher, HHP will conduct radon mitigation. Deteriorated surfaces that are suspected to contain asbestos will be recommended to be analyzed by a certified lab. Friable asbestos materials should be evaluated by a state licensed asbestos professional, which may impact the risk weight, and to recommend mitigation options. Occupants will be educated about the hazards found during the assessment and owners and tenants will both receive copies of assessments, and test and lab results.

All healthy homes interventions will be written up as work specifications as funding allows. HHP will collaborate with the Columbus Public Health Department Healthy Homes Program in implementing the initiative. Re-evaluation of work by CPH will be limited to significant mold and moisture remediation, while other completion of rehabilitation evaluation will be confirmed by the HRT using the work specifications and Action Plan as a guide and check list.

Work Specifications/ HHRS Activities

Work Specifications are developed on a unit-by-unit basis and will be based on the findings of the Healthy Homes Action Plan, the most cost effective methods and program experience. Program contracts with radon companies will provide suggested radon mitigation methods and state licensed radon contractors will complete radon mitigation. Non-radon healthy homes items will be addressed by HIC/General Contractors and RRP certified contractors. During the start-up time period, Columbus Public Health, will write up a Healthy Homes Assessment Report and Action Plan. Healthy Homes action plan and Healthy Homes report will be sent to HHP and will be based on the HHRS risk ranking for each unit, and included with HHP unit bids. Priority repairs identified through HHRS will focus on radon, ratings A-I, asthma burdens and mold and moisture issues followed by other hazards. Priority repairs include: radon mitigation, smoke detectors/carbon

monoxide detectors; mold and moisture remediation and repairs e.g. basement remediation will include removal, cleaning, and sealing, and very limited put-back/finishing, rain gutters and downspout extensions, grading around the home and bath exhaust venting; pest control; and fall hazards focusing on hand rails. Other hazards will be considered on a case-by-case basis as funding allows. Only licensed lead abatement contractors will be used as contractors to remediate and repair lead paint hazards. Work specifications will follow industry standards where not already required by local and state codes such as the IICRC S520 for mold remediation. A licensed pest control operator will provide treatments for roaches, bed bugs, and rodents using the least toxic IPM approach. Monthly meetings between the grantee and Columbus Public Health will be required to provide updates with HHRS Assessments. Phone calls, emails, and additional meetings will be required to trouble-shoot timely issues. The HRT will create Healthy Homes works specifications based off of the Program Manager's recommendations for priority of hazards. The HHP HRT and Program Manager will provide final review and approve all work specifications for bidding. HHP has the capacity to recruit, train and sustain a qualified contractor pool. LSC contractor pool consists of 10 qualified lead abatement contractors, licensed by the State of Ohio, certified with the EPA as RRP firms and licensed as Home Improvement Contractors with the City of Columbus and some will be used under the HHP grant. HHP staff will let bids for work to this pool of contractors through an online bidding portal, Bid Express.

Final Inspection of Health Homes Interventions:

Re-evaluation of Healthy Homes intervention work will be completed for every unit with Healthy Homes work completed. The PM will update the Action Plan and will submit it to the occupants and owner. A visual inspection and the work specifications will be used as a guide and check list. Re-evaluation of mold and moisture remediation work will be conducted within two business days following notification of the lead hazard control clearance from the grantee.

Financial Assistance

Grants for eligible activities will be awarded through a Grant Agreement between HHP and the eligible property owner. At the signing of the grant agreement, the owner will be given a copy of the work specs and all documents signed. The owner will also sign a Monitoring and Maintenance plan at the time of signing the Grant Agreement. A grant averaging \$7,500 per unit will be awarded. A contingency of 15% over and above the contract amount will be set aside for approved change orders. The City reserves the right to grant funds, when necessary, that exceed the average estimated grant amount of \$7,500 per unit, in order to complete a project.

Eligible project costs include only those hard costs (material and labor) generated by the work specifications and are designed to eliminate healthy housing hazards. All payment of funds will be made directly to the contractor after receiving a signature of approval from the property owner and a Final Inspection is completed by HHP. HHP has the right to process the invoice once work is completed without the owner's signature if owner is unavailable or not responsive to signing the invoice. HHP may retain 10% of any

requested draw payment until that unit passes a final inspection. Upon receipt of an acceptable Final Inspection, the amount retained will be fully disbursed. All grant agreements with investor owners require that the owner keep rents affordable and occupied by low-to-moderate income households for a period of not less than three years after the completion of all work. The owner is responsible to provide a self-report to HHP for the three (3) years obligation period showing lease agreements and occupancy information (ages of all occupants) for any tenants in a rental property. If the property is sold all grant funds must be repaid to HHP. Grant closings will be supervised by PM.

Restrictive covenants will be placed on all properties for a time of three (3) years starting from the date work is completed; based on a Final Inspection sign off. Restrictive covenants will be released after the three years period is up.

All projects with HHP grant amounts over \$10,000/unit for Healthy Homes work must have written approval to proceed (email, letter, etc.) from HHP's Government Technical Representative (GTR) in the HUD Office of Lead Hazard Control and Healthy Homes in Washington DC.

Addressing Lead Hazards in Homes

In some circumstances lead hazard control will be performed in some properties if the property does not qualify for the Lead Hazard Reduction Demonstration grant. The Relocation (if applicable) and Lead Inspection Risk Assessor (if applicable) vendors are selected by responsive bids from an Invitation to Bid (ITB). All vendors must sign a contract yearly with the City of Columbus in order to receive any funding.

The owner must allow a lead inspection and risk assessment (if applicable) to be conducted by a State licensed Risk Assessor. All lead inspections, risk assessments and lead hazard control work specifications must be prepared by State licensed City staff or a private contractor Lead Licensed by the State of Ohio. The owner must allow a final clearance test after the lead hazard control work is completed (if necessary). Clearance test must pass in order to receive payment and to finalize project.

In the first 90 days of the grant period, HHP will secure the services of local environmental firms for lead inspections, risk assessments, work specification and clearance testing through a completion of a contract. The firms will use an accredited laboratory for air, dust, paint and soil sampling (through EPA's National Lead Laboratory Accreditation Program (NLLAP)). Contracts are in effect for the 1 year and are eligible for extension yearly. Contractors deliver risk assessments and specifications within 21 days of request depending on volume. State of Ohio regulations, City of Columbus, LSC guidelines, Title X, and HUD guidelines will be followed for each project.

The HHP Lead Hazard Control Strategy is using interim control methods, abatement methods or a combination of the two listed in 2012 HUD Guidelines Chapters 2, 5, 7, 8 and 10 through 14; in compliance with Title X, and State and City requirements. Interim control methods, which include paint stabilization of deteriorated paint, treatment for friction and impact surfaces and lead contaminated soil, are expected to last less than five

years and would require ongoing maintenance from the owner of the unit. Abatement methods which include removal, enclosure or encapsulation of lead hazards, are more permanent and expected to last more than 20 years and require little or no ongoing maintenance.

The entire unit is to be cleaned to meet HUD clearance standards of 10ug/ft² for interior floors, 40 ug/ft² for porch floors, 100ug/ft² for window sills and 100ug/ft² for window wells. Contractors are given a list of HHP contracted risk assessors to schedule the final clearance inspection; a 24-hour notice is required and time of inspection is relayed to the project monitor. The lead abatement contractor must be present with the Risk Assessor at the time of clearance testing. The test results are sent to the lab; a 24-hour turnaround of the first test results and a 12-hour turnaround for second sampling, if needed, are standard. The Risk Assessor will contact the contractor and HHP HRT or PM with the results. If a second inspection is needed, a punch list is created and completed. The second inspection is scheduled within 24 hours of notification and sampling will be done according to HUD guidelines. The costs of the first inspection is borne by HHP; however, all costs of subsequent re-inspections are borne by the contractor. Once the unit has cleared the Lead specifications (if applicable), the HRT or PM notifies the Relocation Specialist. The Relocation Specialist notifies the occupants and the Relocation vendors that the unit is safe for the occupant's return.

HHP will adhere to HUD Program requirements, the Uniform Relocation and Real Property Acquisition Policies Act of 1970, as amended (Uniform Act), and the HUD Handbook 1378, Tenant Assistance, Relocation, and Real Property Acquisition, dated October 15, 1990, as amended, while planning and/or implementing lead hazard control projects. To implement this plan, HHP has developed a procedure to ensure that relocation services are made available to persons requiring temporary relocation during lead hazard reduction projects and to ensure that everyone is treated fairly and equitably. The relocation plan is based on a short-term, temporary displacement of residents. The relocation plan includes setting up direct-bill accounts for transportation, housing and moving services. Direct-bill accounts will be established with local cab companies, extended stay hotels, and local moving and storage facilities. The projected time frame to complete a lead hazard reduction project using a combination of interim control methods and abatement methods is 5 to 10 calendar business days. After successful clearance has been determined by the Risk Assessor, residents are allowed to move back in the unit.

All occupants must be relocated during lead work with the exception of where lead work is minimal and will not affect access to bathroom, bedroom, and kitchen. Waiver of temporary relocation for occupants will be require approval from the Program Manager (PM). HHP will cover costs for temporary relocation that includes hotel and related fees, taxi, gas mileage reimbursement, storage services, and other out of pocket expenses that are necessary to complete the Lead Hazard control work and must be approved by the PM prior to the expense.

Relocation Specialist will submit claims for payment for vendors/clients for temporary relocation to PM with the following documentation: Invoices from vendors, Relocation expense claim form, and cover sheet. For gas mileage reimbursement HHP will use the

City of Columbus gas reimbursement rate to reimburse temporarily relocated occupants to and from hotel, work, school, and other places as necessary. Gas mileage reimbursement will be paid directly to the client and is based upon approval from the PM.

At times it may be necessary to relocate an occupant while extensive Healthy Homes repairs are being completed if the occupant does not have access to a bathroom or kitchen for a prolonged period of time. The same process will be followed as mentioned above for those occupants.

Program Administration and Financial Management

Program administration will be accomplished by the Program Manager with oversight by the Project Director. The Program Manager will have oversight of activities from enrollment to lead hazard control, contractual agreements with outside contractors and partnership agreements, through the payment of invoices to ongoing maintenance and final close out of the grant. The Program Manager will manage the flow of the activities. Financial duties will be accomplished by the Program Manager and Fiscal staff performing budget management duties such as grant closings, payment of invoices, preparing documents for LOCCS draw of funds from HUD. Construction invoices will flow from the Housing Rehabilitation Technician to the Program Manager. Invoices will be sent to the Fiscal staff for payment. Then the Fiscal staff will prepare the documents to make the draw from HUD. The Finance Department will provide approved LOCCS personnel. Funds will be drawn from HUD as needed and at a minimum monthly. The Program Manager will also prepare monthly and quarterly reports relative to HHP activities for submission to the Project Director and/or Housing Division Administrator and HUD.

Environmental and Historic Reviews

The Environmental Review Tier I will be completed by Grants Management Division. The Program Manager and Rehabilitation Technician will complete all site specific Tier II Environmental Reviews for all units coming through the program. All Environmental Reviews will be uploaded and completed in HEROS by the PM.

The Historic 106 Review will be completed by the State Historic Preservation Office. Historic Alteration forms will be evaluated by the City of Columbus Historic Preservation Officer as needed.

Ongoing Monitoring and Maintenance

Site visits will be conducted at least once per three (3) years monitoring period to check projects and the maintenance of them. Monitoring visits will be conducted by Program Manager or Housing Rehabilitation Technician. A copy of the work specifications will be reviewed and units examined to determine if the work is holding up as expected. Monitoring will occur for up to three years after the completion of each project.

Non Compliance

Any non-compliance as determined by the City of Columbus of the previously stated obligations, policies or procedures, the Grant Agreement or the Healthy Homes Contract will constitute an element of default. This may also include but is not limited to, failure to complete the contract and commencing work prior to closing of the Grant Agreement. Non-compliance during the affordability period (3 years) may result in repayment of grant funds/suspension from the HHP program.

Training

HHP will provide training throughout the grant period to ensure that pools of both qualified lead abatement contractors and workers are sustained for the period of the grant. Columbus-based Repair, Renovation, Painting (RRP) training services are available and will be invoiced to HHP on behalf of participants.

Community Education: *Outreach will continue to distribute information to the community in regards to healthy housing, through daycares, elementary schools, Opportunity Rising Cbus week events and organizations that work with young children, disabled, and the elderly.*

Landlord Fair Housing Training: HHP will collaborate with Columbus Urban League to conduct Fair Housing training for owners of rental property receiving HHP grant funds. Training will include affirming the marketing of units. The training is mandatory and required by HHP to receive HUD Healthy Homes grant funds.

Evaluation

Monitoring Plan and Internal Audit: PM will perform a risk assessment and will conduct desk top or site visit monitoring as necessary. Contractors will be constantly monitored for workmanship and use of funds.

Monitoring reviews will consist of the following goals:

- Ensuring programs and agencies are complying with fiscal and programmatic regulatory requirements;
- Ensuring that public funds are spent in a prudent manner; and
- Providing technical assistance and advice on program implementation.

Forms / Documents

The following forms and documents are used as a part of our Healthy Homes program

- Application
- “Next Steps” informs client of what to expect.
- Residential Occupant Profile
- Income Verification
- “Healthy Homes” brochure
- Feasibility Inspection form
- Property photos
- Historic Preservation review form; Historic Alteration form if needed

- Environmental review form
- Property Verification from county auditor's web site
- Relocation Preliminary Evaluation
- Lead Inspection / Risk Assessment (if applicable)
- Decent, Safe, & Sanitary Inspection
- Radon Testing
- Healthy Homes Rating System Assessment
- Work Specifications
- Bid Package
- Grant Agreement
- Contractor Agreement / Contract
- Proceed Order
- Change Orders
- Invoices