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RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
I. Purpose				
<p>The purpose of the lead-based paint review is to determine whether the recipient is in compliance with the Lead-Based Paint Poisoning Prevention Act and the Residential Lead-Based Paint Hazard Reduction Act of 1992.</p> <p>Lead-based paint requirements apply to the Indian Housing Block Grant (IHBG) and Indian Community Development Block Grant (ICDBG) programs.</p> <p>Lead-based paint requirements apply to any activities that involve housing construction; rehabilitation (including the reduction of lead-based paint hazards, but excluding routine maintenance, repair and replacement); or other public construction under the Resident Opportunities and Self-Sufficiency program.</p> <p>All property assisted under the Rural Housing and Economic Development Program/Rural Innovation Fund is covered by lead-based paint requirements.</p>	<p>24 CFR Part 35, Subparts A, B, H, J, K, M, and R (IHBG & ICDBG)</p> <p>24 CFR Part 35, Subparts B and E (ROSS)</p> <p>24 CFR 1000.40</p> <p>24 CFR Part 35, Subparts B and E (RHED/RIF)</p> <p>42 USC 4822-4846</p> <p>42 USC 4821-4846</p> <p>42 USC 4851-4856</p>	<p>Office of Healthy Homes website: http://hvwau.ap1153.hud.gov:8080/HUDLBP/welcome.html</p> <p>40 CFR Part 745, Lead-based paint hazards</p> <p>www.epa.gov</p> <p>U.S. EPA, Office of Pollution Prevention and Toxics</p>		<p>Read & Noted</p>



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	Public Law 102-550, Residential Lead-Based Paint Hazard Reduction Act, 1992 24 CFR 1003.60	PIH Notice 98-54 NAHASDA Guidance 2001—05T		
II. Pre-Visit Preparation				
A. If available, review the following documents as they pertain to lead-based paint: <ol style="list-style-type: none"> 1. Most recent IHP, approved IHP amendments, IHP amendments in process 2. Previous monitoring findings and corrective actions status for findings 3. Previous self-monitoring report(s) 4. Previous 2 CFR Part 200 and OIG audit findings, work papers, and management plan status for findings 				Read & Noted



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5. Previous and current enforcement actions 6. Valid complaints or knowledge of lawsuits 7. Relevant correspondence				
B. Determine the types of housing activities the recipient is undertaking. NOTE: Lead-based paint requirements generally apply to federal housing assistance for buildings constructed prior to 1978.	24 CFR § 1000.40	NAHASDA Guidance 01-05 (Tribe) Topic: Lead-Based Paint		In 2021, the Tribe is operating Rental Assistance, Rapid-Rehousing, Homelessness Prevention and other housing services.
<p>The reviewer should determine what activities the recipient is undertaking and are most likely to invoke compliance with lead-based paint requirements. These activities will generally involve rehabilitation, modernization, operation, acquisition, and down payment assistance.</p> <p>The exception for housing for the elderly means retirement communities of similar types of housing reserved for households composed of one or more persons 62 years of age or older or other age if recognized elderly by a specific federal housing assistance program. There is not an exemption for rehabilitation of privately-owned where the occupant or owner is elderly.</p>	24 CFR § 35.115, Exemptions. 24 CFR § 35.86 Definitions: Housing for the Elderly			Read & Noted



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III. On-Site Review				
<p>A. The reviewer should select samples, as appropriate to the recipient, from properties that (1) received project-based assistance; (2) were rehabilitated; (3) were acquired, leased, or operated with HUD funds (including down payment assistance); and (4) received tenant-based rental assistance. Review the sampling methods in the General Instructions.</p>				<p>I have used the 10 randomly selected client files used for Admission & Occupancy review as well for this review for our (TBRA) Tenant Based Rental Assistance and (RRH) Rapid Rehousing programs.</p>
<p>B. The reviewer should verify that the recipient has documentation on the age of the units assisted.</p>	<p>24 CFR § 35.115</p>			<p>Read & Noted</p>
<p>1. If the recipient does not have documentation on the age of the units assisted, a finding may need to be made, contact Supervisor.</p>				<p>Every current client file was verified by program staff to ensure a primary source documentation was in file for the age of the residence. Moving forward, this requirement has now been integrated into the HUD inspection template to ensure that verification of age is checked each year prior to inspection approval by the Team Leader or Housing Director.</p>



RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
C. If review of the files demonstrate that the recipient has only been assisting units constructed after 1978, no further review of the lead-based paint requirements is necessary.	24 CFR § 35.115			Read & Noted – 3 of the 10 files reviewed were built prior to 1978 and Lead-based paint was monitored during their HUD inspections annually and identified no issues.
IV. Subpart H – Project-Based Assistance (not applicable to ICDBG)				-
Purpose				-
The requirements of this subpart apply only to the IHBG-assisted dwelling units in a covered property and any common areas servicing those dwelling units. This subpart does not apply to housing receiving rehabilitation assistance.	24 CFR Part 35, Subpart H	www.epa.gov/y – Testing Your Home for Lead		Read & Noted
A. PROGRAM REVIEW				-
1. Does the program ensure that owners consistently and accurately assess units for the applicability of the Lead Safe Housing Rule and document exemptions?	24 CFR 35.115 – Exemptions; 24 CFR 35.700			Yes, staff conduct home visits and are trained to do visual inspections. Some visits are done virtually during C19, but still getting photos and visual tours virtually.
2. Does the program consistently ensure that owners provide copies of the Lead Hazard Information Pamphlet to occupants of assisted units?	24 CFR 35.710(b)			Although the landlord does address this, our Program has chosen to always address this as well to ensure our clients remain informed during the initial application process.



RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
<p>B. FILE REVIEW Answer these questions for each project file reviewed.</p>				
<p>1. In Remarks column enter the name and address of owner and property that received project-based assistance.</p>				Read & Noted
<p>2. Does the owner's lead program for the property include the following elements necessary to demonstrate compliance with the requirements of the Lead Safe Housing Rule? (answer the relevant questions below based on the level of project-based assistance provided):</p>				
<p>3. Identify lead hazards:</p>				Yes, inspection at pre-occupancy and annual HUD inspection would look for and identify hazards. Any areas of concern would trigger mitigation activity to correct and stabilize with the landlord. All staff complete HUD Lead-based paint visual assessment training.
<p><i>a. PBRA assistance up to \$5,000 per unit per year average: visual assessment for deteriorated paint;</i> OR</p>	<p>24 CFR 35.720(a)</p>			N/A for 2021



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<i>b. PBRA assistance <u>more than \$5,000</u> per unit per year average: all LBP hazards identified in risk assessment.</i>	24 CFR 35.715.(a)			N/A for 2021
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RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
4. Documentation of receipt <u>by occupant</u> of the Lead Hazard Information Pamphlet?	24 CFR 35.710(b)			Yes, received at program entrance.
5. <i>PBRA assistance up to \$5,000 per unit per year average:</i> Procedure for performing paint stabilization of deteriorated paint, with an ongoing LBP maintenance program? OR	24 CFR 35.720(a) and (b)]			N/A for 2021 – no mitigation required Mitigation would be coordinated with case manager ensuring the mitigation is addressed by the landlord. If mitigation effort is not timely by the landlord, then the Team Leader would be engaged for further negotiation and the rental payment would be held until correction occurs or a new unit would be found for the client.
6. <i>PBRA assistance over \$5,000 per unit per year average:</i> Procedure for performing lead hazard control, with an ongoing LBP maintenance program?	24 CFR 35.715 (a) and (b)			N/A for 2021 – no mitigation required
7. Did the owner provide to occupants a Notice of Lead Hazard Evaluation (when paint testing or risk assessment is performed) or Lead Hazard Reduction (when interim controls or abatement is performed)?	24 CFR 35.710(a)			N/A for 2021 – no mitigation required



RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
8. Is there documentation of use of lead safe work practices by trained or supervised workers and maintenance personnel during all paint disturbing work above <i>de minimis</i> amounts, including interim controls and ongoing lead-based paint maintenance activities?	24 CFR 35.715(b) and (c); 24 CFR 35.720(b); 24 CFR 35.1330(a)(4)			N/A for 2021, landlord controlled.
9. Is there a clearance report for all work above the <i>de minimis</i> amounts?	24 CFR 35.715(b), 24 CFR 35.720(a)(2) and 24 CFR 35.1340(c)			N/A for 2021 – no mitigation required
10. Is there a complete response to a child having an Environmental Intervention Blood Lead Level (EIBLL)?	24 CFR 35.730			N/A for 2021 – no mitigation required
11. Is there an ongoing lead-based paint maintenance plan where actions are based on results or reevaluation hazard control and other activities?	24 CFR 35.715(c) and 24 CFR 35.1355(c)			N/A for 2021 – no mitigation required
12. Ongoing lead-based paint maintenance and reevaluation:				N/A for 2021 – no mitigation required



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<p><i>a. PBRA assistance up to \$5,000 per unit per year average: Is there a procedure for obtaining visual assessment for deteriorated paint at turnover or annually, and performing paint stabilization?</i> OR</p>	<p>24 CFR 35.720(a) and (b); 24 CFR 35.1355(b) and (c)</p>			<p>N/A for 2021; Visual inspection at home visits and annual HUD inspections would include visual assessment for Lead-based paint.</p>
<p><i>b. PBRA assistance over \$5,000 per unit per year average: Is there a procedure for obtaining a lead reevaluation every other year, and performing lead hazard control based on the reevaluation?</i></p>	<p>24 CFR 35.715(a) and (b); 24 CFR 35.1355(b) and (c)</p>			<p>N/A for 2021 – no mitigation required</p>
<p>13. Does the recipient ensure that applicants are not being denied housing based on familial status and that pre1978 homes of families with children up to age 18 are being tested and treated for lead hazards when triggered by the regulation?</p>	<p>24 CFR 100.50(b); 24 CFR 35.700</p>			<p>Yes.</p>



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<p>NOTE: The lead-based paint requirements apply to all pre1978 units receiving project based assistance that are not otherwise exempt from the rule, and are not restricted to only those units occupied by children under age 6. The Fair Housing Act prohibits denial of services, including Federally funded housing rehabilitation, based on familial status (presence of children under age 18) or disability.</p>				
<p>V. Subpart J – Rehabilitation</p>				<p>N/A for 2021</p>
<p>Purpose</p>				
<p>The purpose of this review is to ensure the recipient has established procedures to eliminate, as far as practicable, lead-based paint hazards in a residential property that receives federal rehabilitation assistance.</p>	<p>24 CFR Part 35, Subpart J</p>			<p>Read & Noted</p>
<p>A. Was the age of the rehabilitated units documented?</p>				<p>N/A for 2021</p>



RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
B. If the units were built before 1978, did the recipient document the age of the unit or have documentation to verify that the units had been tested and found not to contain lead-based paint?				N/A for 2021
C. If the age of the project-based units is prior to 1978, is there evidence that the recipient did the following, according to each property type listed below?				N/A for 2021
1. For all Properties:				N/A for 2021
a. Provision of pamphlet.				N/A for 2021
b. Paint testing of surfaces to be disturbed, or presume lead-based pain.				N/A for 2021
c. Notice to occupants.				N/A for 2021
d. Ongoing lead-based paint maintenance.				N/A for 2021
2. Property receiving less than or equal to \$5,000 per unit:				N/A for 2021



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a. Safe work practices in rehab.				N/A for 2021
b. Repair disturbed paint.				N/A for 2021
c. Clearance of the worksite.				N/A for 2021
3. Property receiving more than \$5,000 and up to \$25,000:				N/A for 2021
a. Risk assessment.				N/A for 2021
b. Interim controls.				N/A for 2021
4. Property receiving more than \$25,000 per unit:				N/A for 2021
a. Risk assessment.				N/A for 2021
b. Abatement of lead-based paint hazards.				N/A for 2021
c. Interim controls allowed for exterior.				N/A for 2021
5. If paint testing indicates that the painted surfaces are coated with lead-based paint (or were presumed to contain), were safe work practices followed?	24 CFR § 35.125(a), Paragraph 930(a)			N/A for 2021



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a. If force account was used, were workers and the supervisor appropriately trained? (They would have to be certified.)				N/A for 2021
6. If the work was contracted, was the abatement conducted under the supervision of a certified lead-based paint abatement supervisor?				N/A for 2021
(1) Did the contract require that the abatement work be conducted under the direction of a certified lead-based paint abatement supervisor?				N/A for 2021
7. Were the occupants of the unit relocated during the rehabilitation in accordance with the Uniform Relocation Act?	24 CFR § 35.134			N/A for 2021
8. If a painted surface was disturbed that contained lead-based paint, was a clearance examination of the worksite(s) performed?	24 CFR § 35.1330(d)			N/A for 2021



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<p>Note: Clearance is not required if rehabilitation did not disturb painted surfaces of a total area more than that set forth in the applicable regulations. (At a minimum, interior walls of 2 square feet or less as an example)</p>				N/A for 2021
<p>9. Was the individual/firm responsible for the clearance separate from the individual responsible for the abatement/rehabilitation?</p>				N/A for 2021
<p>VI. Subpart K – Acquisition, Leasing, Support Services, or Operation</p>				
<p>Purpose</p>				
<p>The purpose of this review is to ensure the recipient has established procedures to eliminate, as far as practicable, lead-based paint hazards in a residential property that receives federal assistance under certain HUD programs for acquisition, leasing, support services, or operations.</p> <p>Examples of the types of housing assistance to which subpart K applies are acquisition or</p>	<p>24 CFR Part 35, Subpart K</p>	<p>Renovate Right – Important Lead Hazard Information for Families, Child Care Providers and Schools.</p>		<p>Read & Noted.</p>



RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
leasing of homeless facility, down payment assistance, mortgage and utility payments for persons with AIDS (if a child under 6 resides), and payment of security deposits.				N/A for 2021
Note: The requirements of Subpart K do not apply if the assistance being provided is emergency rental assistance or foreclosure prevention assistance, provided that this exemption shall expire for a dwelling unit no later than 100 days after the initial payment or assistance.				N/A for 2021
A. Was the age of the units documented?				N/A for 2021
B. If the units were built before 1978, did the recipient have documentation to verify that the units had been tested and found not to contain lead-based paint?				N/A for 2021
C. If the age of the project-based units is prior to 1978, is there evidence that the recipient did the following:				N/A for 2021
1. Provision of pamphlet.				N/A for 2021
2. Visual assessment.				N/A for 2021



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3. Paint stabilization.				N/A for 2021
4. Notice to occupants.				N/A for 2021
5. Ongoing lead-based paint maintenance for ongoing assistance.				N/A for 2021
D. If the unit did not pass a visual inspection, was paint stabilization completed for each deteriorated paint surface and clearance performed before occupancy of a vacant dwelling unit; or, where the unit is occupied, immediately after receipt of federal assistance?				N/A for 2021
E. Has the unit been tested and found to be free of lead-based paint?				N/A for 2021
F. If the unit failed any of the annual visual paint assessments, was paint stabilization of each deteriorated paint surface and clearance performed before occupancy of a vacant dwelling unit; or, where a unit is occupied, immediately after receipt of federal assistance?				N/A for 2021



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VII. Subpart M – Tenant-Based Rental Assistance (not applicable to ICDBG)				
Purpose				
<p>The purpose of this review is to ensure the tribe/TDHE has established procedures to eliminate, as far as practicable, lead-based paint hazards in housing occupied by families receiving tenant-based rental assistance.</p> <p>Note: This subpart applies only to dwelling units occupied or to be occupied by families or households that have one or more children of less than 6 years of age; common areas servicing such dwelling units; exterior painted surfaces associated with such dwelling units or common areas; including those areas through which residents pass to gain access to the unit and other areas frequented by resident children of less than 6 years of age, including on-site play areas and child care facilities.</p>	<p>24 CFR Part 35, Subpart M</p>	<p>PIH Notice 98-54</p> <p>NAHASDA Guidance 2001—05T</p> <p><i>See Attached</i></p>		<p>Read & Noted</p> <p>One file, RA 100, reviewed in 2021 was built prior to 1978 and had a child under 6 years old in residence.</p> <p>The program is concerned that these additional common areas may not have been inspected previously for our current TBRA clients. The program has identified all current TBRA clients with kids under 6, totaling 2 clients, and completed additional inspections to cover these areas.</p> <p>Additionally, the program has now created an addendum, pg 20, for the HUD inspections form that will be used for any residences built in or before 1978 that also has a child under 6 in residence. The new form identifies the common areas to inspect and records the inspection results for those areas.</p>
A. Was the age of the units documented?				Yes for all.
B. If the units were built before 1978, did the recipient have documentation to verify				No lead-based paint test results, but have evidence of visual inspection pre-occupancy and annually for paint exposure.



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that the units had been tested and found not to contain lead-based paint?				
C. If the age of the project-based units is prior to 1978, is there evidence that the recipient did the following:				Read & Noted
1. Provision of pamphlet.				Yes, at entrance to program and by landlord for all three units.
2. Visual assessment.				Yes, noted in the inspection and/or annual re-inspection for all three units.
3. Paint stabilization.				None needed due to age for 7; None needed per inspection for 3 built prior to 1978.
4. Notice to occupants.				N/A for all three units as no areas of concern identified.
5. Ongoing lead-based paint maintenance.				None needed due to age for 7; The three built prior to 1978 will be verified again at annually via the HUD re-inspection and at any visitations.
6. Response to child with environmental intervention blood lead level .5.				N/A for all units.
D. Did the recipient provide any rental assistance (for more than 100 days) to units that have one or more children of less than 6 years of age?				Yes, 1 unit as reviewed, but 2 in program total.



RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
1. If no, verify through a sampling of tenant files.				
E. Where assistance was provided to a family with a child under 6:				
1. Did the recipient do an initial inspection and periodic inspections in order to identify any deteriorated paint? Or				Yes, as part of the HUD inspection, re-inspection, and visitations..
2. Did the recipient have a visual assessment done of the unit for deteriorated paint surfaces in accordance with procedures in order to identify any deteriorated paint?				Yes, as part of the HUD inspection, re-inspection, and visitations. Additionally, we just completed visual on-site inspections of all common areas for both clients.
F. If the unit did not pass the visual assessment for deteriorated paint surfaces, did the owner stabilize each deteriorated paint surface and before commencement of assisted occupancy?	24 CFR § 35.1330(a)			N/A for 2021 - , no deterioration or mitigation identified for all units tested
G. If the unit did not pass a visual assessment and if assisted occupancy has commenced prior to a periodic inspection, was the paint stabilization completed within 30 days of notification of the	24 CFR § 35.1340			N/A for 2021- all units passed visual inspections



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owner of the results of the visual assessment? Note: Paint stabilization is considered complete when clearance is achieved.				
H. Where paint stabilization occurred:	24 CFR § 35.125			N/A for 2021 – no stabilization needed
1. Did the owner provide a notice to residents?				N/A for 2021 – no stabilization needed
2. Has the recipient been informed by a public health department of a child less than 6 years of age with an environmental intervention blood lead level and	24 CFR § 35.1225			N/A for 2021 – no stabilization needed
a. If so, was a risk assessment completed within 15 days of notification if not already completed by the local public health department?	24 CFR § 35.1225(a)			N/A for 2021 – no stabilization needed
b. If health hazards were identified, were the corrected by the owner within 30 days?	24 CFR § 35.1225(c)			N/A for 2021 – no stabilization needed



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c. Did the owner notify building residents of any evaluation or hazard reduction activities?	24 CFR § 35.1225(d)			N/A for 2021 – no stabilization needed
d. Did the recipient report the name and address of a child identified as having an environmental intervention blood lead level to the public health department within 5 working days of being so notified by any other medical health care professional?	24 CFR § 35.1225(e)			N/A for 2021 – no stabilization needed
e. At least quarterly, did the recipient attempt to obtain from the public health department(s) with area(s) of jurisdiction similar to that of the recipient the names and/or addresses of children of less than 6 years of age with an identified environmental intervention blood lead level?	24 CFR § 35.1225(f)			N/A for 2021 – no stabilization needed
f. At least quarterly, did the recipient also report an updated list of the addresses of units receiving tenant-based rental assistance under a assistance to	24 CFR § 35.1225(f)			N/A for 2021 – no stabilization needed



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<p>the same public health department(s)? Note: Report(s) to the public health department(s) is not required if the department states that it does not wish to receive such report.</p> <p>Note: If the recipient obtains names and addresses of environmental intervention blood lead level children from the public health department(s), the recipient shall match information on cases of environmental intervention blood lead levels with the names and addresses of families receiving tenant-based rental assistance, unless the public health department performs such a matching procedure.</p>				<p>- N/A for 2021 – no stabilization needed</p>



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(1) If a match occurred, did the recipient carry out the requirements of this section?	24 CFR § 35.1225(f)			N/A for 2021 – no stabilization needed
VIII. Summary				-
<p>A. Summarize the results of the review in a work paper.</p> <p>B. Discuss significant issues with Supervisor.</p> <p>C. Develop findings, including questioned costs and corrective actions, as appropriate.</p> <p>D. Develop concerns because they could lead to a violation</p> <p>E. Develop report language, including any findings and concerns.</p> <p>F. If there are any major issues identified in this review and the recipient has approval to invest, determine if a withdrawal of investment authority should be recommended.</p>			<p><i>See Attached</i></p>	<p>Program in compliance and one area of weakness identified and corrective action complete.</p> <p><u>Area of weakness identified:</u> The program identified a lack of detailed confirmation that common areas were being inspected for Lead-Based paint deterioration in residences built before 1978 that have children under 6 in residence. The HUD standard inspection form just notes this in a single cell as of other areas of concern; however, the program has created an addendum, pg 20, to add to the standard form that identifies all of the common areas requiring inspection for these residences.</p> <p>This form will now be completed as applicable with the pre-occupancy and annual inspection to capture greater detail of the common areas inspected.</p>



			<p>Since the program felt these inspections were not occurring prior, they have now completed them for the 2 current clients that are applicable to ensure our program is compliant today as well.</p> <p><u>Improvement:</u> When Team Leader or Director are verifying and signing off on inspections, they will be verifying that the confirmation of year built for the property is in the client file. This has been a difficult procedure to put in place for case managers because we have to use multiple sources to seek that confirm; with no consistent instruction to give, the program has integrated a check off of this documentation within the actual HUD form. We feel this will be a better check and balance to ensure we have the required documentation of age of residence for Lead based paint moving forward.</p>
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Reviewer Name:	Jenna Burnett, with Tiffany Ross, interviewed Sharon Paskewitz and Justin Krupa
Review Date(s):	12/07/2021

Jenna Burnett:

Tiffany Ross:



Office of Native American Programs

Lead-Based Paint
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Sharon Paskewitz:

Justin Krupa: