

RECOMMENDATIONS FOR THE OFFICE OF RECOVERY IMPLEMENTATION FEDERAL SUPPORT FOR GREEN AND HEALTHY HOUSING

1. Barrier: Many of the same homes in dire need of weatherization also contain serious lead paint hazards or other related code violations that cause asthma or injury. There are a myriad of federal programs that fund housing interventions in units, yet the programs have inconsistent standards, policies and guidance on how to address housing conditions or contain prohibitions against using other federal funds to leverage a coordinated and common sense approach. This effectively forces local agencies to either duplicate efforts, disregard needed repairs, or reject housing units with excessive needs. The result is that local governments, who are committed to Healthy Housing, in principle, opt for the path of least resistance leaving the most critical work needed to protect a child from poisoning, injury or death undone.

Recommendation: There should be a coordinated Administration strategy to incorporate environmental health-based principles into federal housing and housing-based intervention programs. As a by-product of this coordination, the federal agencies should develop and mandate a “Healthy Home” standard that is required of all (not just HUD) federally funded housing intervention programs (in units built before 1978). Units meeting the standards could carry seal of approval similar to the coordinated “Energy Star” program for a designated period of time before requiring renewal (a Healthy Housing Inspection).

2. Barrier: Current federal rules governing the Weatherization Assistance Program (WAP) do not easily allow weatherization dollars to be used for replacing windows because they do not meet the payback standards contained in 10 CFR 440.21 (c). That section requires that the discounted net present value of the energy savings over the life of the measure exceed the cost of the materials and installation. When only energy costs are considered, windows do not meet this test. However, there are other documented benefits of window replacement, including reducing lead poisoning prevention and improving low income housing that provide a net benefit to the community. In most homes the primary source of lead contamination is old windows with lead painted surfaces, and the most effective lead hazard control measure is window replacement.

Recommendation: The Administration should work to allow up to 15% of each identified grant program flexible dollars to address home-based environmental health hazards, window replacement or issues of energy efficiency. This “weatherization plus” would empower local governments to implement a more comprehensive Green and Healthy Housing program to assure that assistance goes to people with the most need. Under “weatherization plus,” regulations by DOE would work in concert with HUD lead hazard control standards. Window replacement would also be a permissible component of a weatherization project when the following criteria are met: Lead hazards have been identified in the windows of the property and children under age 6 or pregnant women reside or frequent the property.

3. Barrier: Weatherization activities that disturb painted surfaces in pre-1978 properties may generate hazardous lead dust and debris but contractors are not required to follow lead safe work practices. The EPA Repair and Renovation Rule promulgated by the Bush Administration squandered the opportunity to assure all contractors disturbing lead based paint must “clear their work through an appropriate and scientifically sound lead dust clearance standard.”

Recommendation: Mandate that all federally supportive housing intervention grant programs (weatherization, energy efficiency, NSP, HOME, CDBG) and federally supported housing (i.e., Housing Choice Voucher/Section 8) are in full compliance with lead safe work practices in units built before 1978 – and require lead dust clearance testing if work disturbs more than 2 sq. feet of lead-based paint.

4. Barrier: The inconsistency in federal, state and local regulations of environmental hazards in rental housing has left generations of children, especially poor and minority children, plagued by lead poisoning, asthma, permanent injury and even death.

Recommendation: The Administration should develop and mandate a healthy housing standard for all rental housing to help close the gap on housing-related health disparities and leverage broader ARRA activities.

5. Barrier: The federal government often fails to support local Healthy Housing efforts through arbitrary reimbursement guidelines in Medicaid and WIC programs – thus constructing unnecessary barriers and disincentives for the primary prevention of home-based environmental health threats that undermine the development of children in low and very-low income communities.

Recommendation: Medicaid programs should pay for environmental investigations and prescriptive environmental health-based housing interventions such as window replacement or proven healthy homes interventions to complement energy efficiency. By providing reimbursement for interventions to address housing related illnesses (asthma, lead poisoning and safety/injury hazards), we will increase the effectiveness of primary prevention efforts at the state and local level and leverage comprehensive efforts being made through energy conservation investments.

Recommendation: Federally supported WIC programs should be funded to test for lead exposure with hematocrits when children have not been tested as recommended through the primary care system.

Suggestion for Long-term planning: Over time, HUD has been and will be the lead agency in assuring our transition to a Healthy Housing standard in this country. Currently, there are 5 active Departments engaged in this work – HUD, DHHS/CDC, EPA, DOE and USDA. As inextricably linked as Green and Healthy Housing are, HUD should consider the potential benefit and efficiencies gained by incorporating the work of HUD's Office of Healthy Homes and Lead Hazard Control (25 employees) with that of the 50 Community Planning and Development employees working on related issues and move both in with the new HUD Office of Sustainability. This should be done only if the Office of Healthy Homes would be allowed to continue its work and would not be impeded but rather supported by the move.

In closing, we suggest that the Administration consider announcing adopted recommendations at the Surgeon General's Call to Action for Healthy Housing on June 9, 2009 – and elevate this Call to Action to include the Executive Office of the President.