



STATE OF CONNECTICUT
DEPARTMENT OF HOUSING



CDBG Small Cities Bulletin

Bulletin Number: 2024-01

To: Small Cities Grantees and Interested Parties
Date: February 26, 2024
From: Miguel A. Rivera, Director, Housing and Community Development
Subject: Lead Requirements

The purpose of this Bulletin is to remind grantees of the requirements and best practices in implementing the HUD Lead Safe Housing Rule (LSHR) in their programs.

All units in a project assisted with CDBG funds must comply with 24 CFR Part 35, which implements Title X of the Housing and Community Development Act of 1992, also referred to as the LSHR. This regulation has been in effect since September 15, 2000, and Subpart J applies to rehabilitation projects, which may include lead abatement or lead remediation activities. If a home was constructed prior to 1978, the LSHR applies.

It has come to our attention that some grantees are allowing lead abatement contractors/EPA RRP-certified firms to procure their lead consultants to conduct clearance lead dust wipe sampling at their lead abatement/remediation jobs. This is not allowed as this is a conflict of interest. Grantees must procure their lead consultants to conduct clearance lead dust wipe sampling after lead abatement/remediation work is completed by lead abatement contractors and/or EPA RRP-certified renovators. Additionally, once clearance is achieved and documented, grantees are required to either (1) send the lead clearance reports to the homeowners via certified mail or (2) personally hand the reports to them and have them initial the copies of the documents to confirm their receipt and provide a copy to the local health department if a lead abatement has been issued.

Once the lead abatement/remediation has been completed, if any leaded surfaces remain, a Lead Management Plan must be developed by a lead consultant and given to the homeowner. This is to ensure the homeowner knows where lead paint remains and how to best manage it.

More information about the LSHR can be found in the CDBG Grants Management Manual at the following link: https://portal.ct.gov/-/media/DOH/CDBG-Grants-Manual-Docs-May-2020/Entire-GMM_FINAL.pdf. Please review this bulletin and adjust your program accordingly. Should you have any questions concerning this bulletin, please contact your appropriate Small Cities project manager.