



**National Center for
Healthy Housing**



October 8, 2008

Mr. Jon Gant
U.S. Department of Housing and Urban Development
Office of Healthy Homes and Lead Hazard Control
451 7th Street, SW
Washington, DC 20410

Dear Mr. Gant,

On behalf of the National Center for Healthy Housing (NCHH), thank you for the opportunity to comment on the Office's Strategic Plan. We commend you and the Office of Healthy Homes and Lead Hazard Control for your leadership in the arena of healthy homes. We would like to congratulate you for a successful National Healthy Homes Conference and applaud your FY09 budget request, which includes a 50% increase in funding for healthy homes.

The healthy homes movement is on the verge of reaching national saliency and as noted in the Office's plan, green building and other allied movements offer a unique opportunity for mainstreaming healthy homes principles.

By articulating and executing its strategic plan, HUD can seize the many opportunities before us and can help powerfully forward the actions of others.

Attached are NCHH's comments on HUD's strategic plan.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rebecca Morley".

Rebecca Morley

Attachments (3)

National Center for Healthy Housing Comments
HUD's Healthy Homes Strategic Plan
October 6, 2009

Overarching comments

- The document is well-researched and effectively makes the case for better quality housing in the United States. It provides a detailed account of the events leading up to the present day situation.
- HUD has used a comprehensive and transparent process for developing its plan.
- The four main goals identified on page 5 effectively address the core needs in the healthy homes movement, including policy, communications, research, and capacity building needs. Many of the strategies dovetail with those developed by NCHH and the Alliance for Healthy Homes – See Attachment 3.
- The key information for external stakeholders begins on page 31 “Future Directions.” Consider beginning the document with this information and including the past performance and other background either as appendices or after. While the latter information is important, putting the new information first will ensure that more readers are aware of and contribute to HUD’s future strategies.
- We support HUD’s prioritization of short-term and long-term strategies. For all four goals, the strategies appear to be prioritized properly.
- Consider including performance metrics and a method for evaluating your progress. How will you know when you’ve been successful? Some draft possible metrics are included as Attachment 2. With regard to evaluation, NCHH uses an annual operating scorecard which identifies key strategic tasks. We monitor our progress against those tasks every 3-6 months.
- The plan includes many important “incremental” changes. Consider adding two or three high impact transformative strategies. For example, HUD’s budget for healthy homes is really only adequate for a small research and demonstration program. HUD should seek authority and appropriations for a large-scale healthy homes production program that would make a dramatic impact on the 6 million substandard housing units in the country. This large-scale grant program could be paired with a newly authorized national healthy homes code, which would be required for federally assisted housing and better yet, for all privately-owned rental housing.
- Consider adding a strategy related to manufactured housing – both the materials used in manufactured housing and manufactured housing construction standards. Also, consider researching the health of residents residing in modular housing. Well-designed and constructed modular housing can be a healthy and affordable alternative to stick-built housing.
- Grantees that are expanding/transitioning from categorical programs to holistic approaches need guidance for how to get from point A to B. HUD could provide information to grantees about successful healthy homes model programs. To accomplish this, HUD would need to establish benchmarks or performance measure for successful programs.

Detailed comments

- Page 30 -consider listing all 12 focus areas or reference the fact that they appear in the appendix so that readers can determine what items did not make the priority list.
- Page 31 –the mission statement would be more effective if it were shorter and avoided jargon.
- Page 32 - a national conference does not seem to rise to the level of a long-term strategy. It is perhaps an objective or activity. An example of a corresponding long-term strategy could be for example, “to serve as a convener of national, state, and local partners to ensure that best practices are shared and translated into action.”
- Consider moving “defining a healthy home” and “conducting a cost benefit analysis” to short-term strategies.
- Page 34 – consider adding “implement findings from CDC-NCHH Healthy Homes Expert Panel” to short-term strategies. This panel found a range of interventions that have sufficient evidence to move into implementation. HUD could lead this effort through its federally-assisted housing programs and through partnerships with other agencies (Medicaid, DOD, USDA, etc).
- Page 36 – consider creating a “healthy homes element” requirement for Consolidated plans. This would ensure that CDBG/HOME and other local affordable housing dollars consider healthy homes initiatives as part of their planning process.
- Page 36 – with regard to private sector support – consider making a resource available that clearly identifies service providers, products, and materials that are available for consumers and practitioners working in the healthy homes arena (e.g. list of healthy homes specialists, contractors, healthy home products, etc.).

Attachment 2 – Draft Performance Metrics

Measure (Outputs)

- Number of research studies conducted.
- Number of mentions of healthy homes in trades and national media.
- Number of trainings held through the Healthy Homes Training Center.
- Number of individuals trained through Healthy Homes Training.
- Number of Individuals that receive Healthy Homes Specialist Credential.
- Amount of funding for Healthy Homes (at HUD and outside of HUD).
- Number of state Healthy Homes Laws.
- Number of federal Healthy Homes laws.
- Number of communities adopting and actively enforcing the International Property Maintenance Code.

Measure (Outcomes)

Number of children with an elevated blood lead level.	Blood lead level data is collected in the National Health and Nutrition Examination Survey (NHANES).
Asthma prevalence.	The Behavioral Risk Factors Surveillance Systems (BRFSS) collects asthma information on a yearly basis from a telephone interview of over 350,000 adults in all 50 states. This is the largest telephone survey for collecting national health data. The most current data available on-line is for 2007.
Number of homes with severe and moderate hazards.	Collected in the American Housing Survey. This survey is conducted every odd numbered year (2007-2009-2011) and provides national data based on 55,000 housing units. Data for 47 metropolitan areas are also collected every six years. Based on the information available on-line it appears to take at least 12 months for the data to be posted. The most recent information available on line is 2005.
Number of homes constructed with radon mitigation systems.	EPA
Number of homes that have been tested for radon.	EPA
Number of homes with lead paint.	Compare 1999-2002 data to more recent data.
Number of childhood and elder housing-related injuries.	
Number of homes with allergens.	Compare 1999-2002 data to more recent data.



Fact Sheet

September 2008

National Healthy Homes Policy Agenda

All people deserve to live in affordable healthy housing. Healthy housing belongs high on the national policy agenda because indoor exposures eclipse those from the outdoors and add billions to health care costs. Each year, over 13 million non-fatal home injuries occur in the United States; nearly 3,000 people die in house fires; and 2 million persons make emergency room visits for asthma. Mold, dust mites, and cockroaches are associated with asthma. Radon is the second leading cause of lung cancer in the country. Toxic substances like lead, formaldehyde, and pesticides contribute to cancer risks, impair our children's development and cause other health problems. Unintentional injuries in the home environment (especially falls, poisonings, and burns) account for a significant share of emergency room visits and are a leading cause of death among young children.

PRINCIPLES FOR ACTION The Alliance for Healthy Homes and the National Center for Healthy Housing call on leadership from all levels of government and the private sector to create healthful housing for all families in America through the following policy strategies:

- Targeting the highest risk housing stock: older, low-income housing in substandard condition. This approach will yield the greatest improvements in health and reduce disparities borne by low-income and minority families.
- Providing incentives, including need-based subsidies as appropriate, for property owners and tenants, financial institutions, contractors, and builders to integrate health considerations into housing maintenance, finance, and construction.
- Correcting market failures and eliminating disparities in health and housing through practical and evidence-based regulatory actions.
- Assisting communities with problem-solving and action plans to address their local conditions and strengthen their capacity to sustain and build upon solutions.

Federal Action

- 1) **INDOOR ENVIRONMENTAL ACTION LEVELS** Congress should require EPA to set and enforce widespread adherence to health-based standards for indoor exposures including, but not limited to lead, carbon monoxide, radon, and formaldehyde.
- 2) **TSCA REFORM** Congress should reform the Toxic Substances Control Act to ensure that EPA has the information and resources it needs to properly assess the potential health threats posed by building materials and other furnishings or products in the home and takes action to protect residents from risks that may be unnecessary or unreasonable. EPA should systematically identify and prioritize chemical hazards in housing and mitigate known hazards.
- 3) **FEDERAL STANDARDS** Congress should authorize the promulgation of minimum health standards for rental properties, building upon existing model codes. The federal agencies should develop Healthy Homes Guidelines for existing housing, with homes meeting these guidelines receiving a "Healthy Homes Seal of Approval." EPA should broadly market the Energy Star with Indoor Air Package to ensure that all newly constructed homes are safe and healthy.
- 4) **CAPACITY BUILDING** Congress should require federal agencies to coordinate efforts to develop and deliver training for architects, builders, contractors, code inspectors, home inspectors, property owners, other housing providers, and community- and faith-based organizations. Congress should require federal agencies to provide technical assistance, training, and grants to equip state and local health departments, code agencies, and community-based organizations to build local capacity to prevent, identify, and respond to housing-related health hazards.
- 5) **EDUCATION** Congress should authorize a new grant program to provide grants for proven health education programs for low-income and hard-to-reach audiences. A coordinated federally-supported social marketing campaign should be created to raise the visibility of healthy homes and build broad support for it.
- 6) **PROMOTING HOLISTIC PROGRAMS** Federal programs should serve as models for integrating health considerations into housing programs. Congress should authorize flexibility for categorical federal grant programs to enable grantees to efficiently and effectively address client needs. New funding should be authorized to enable greater

coordination among housing, health, and energy programs. For example, the HUD Lead Hazard Control Program and the Department of Energy Weatherization and the Low Income Housing Energy Assistance Programs should encourage its grantees to routinely address health and safety hazards in the homes of their clients.

- 7) **HAZARD DISCLOSURE** Congress should amend the federal Lead Disclosure Law to require that sellers and property owners disclose hazards exceeding the action levels set by EPA to buyers and tenants.
- 8) **DATA COLLECTION** Congress should direct federal agencies to collect and report at the national, state and top 50 municipal levels, indicators of healthy housing through the addition of key questions to existing surveys such as the American Housing Survey, the American Community Survey, the National Health and Nutritional Examination Survey, and the CDC Environmental Health Tracking System. HUD should document model systems for collecting hazard prevalence data through local and state housing programs and code agencies. HUD & EPA should utilize the data to evaluate the effectiveness of the healthy homes standard and assess cost effectiveness of interventions.
- 9) **HOUSING FUNDING** The President and Congress should increase funding for affordable healthy, sustainable housing and ensure all people can afford quality housing. Specifically, the government should: (1) provide sufficient funding to ensure that housing occupied by low- and very low-income households meets the Healthy Homes Guidelines (or existing standards such as HQS or the International Property Maintenance Code until such time as a federal healthy homes minimum property standard is established); and (2) provide tax incentives and funding to offset the marginal costs of integrating healthy homes considerations.
- 10) **MEDICAL REIMBURSEMENTS** The Medicaid and Medicare programs should pay for environmental investigations and interventions for housing-related illnesses including but not limited to asthma, lead poisoning, carbon monoxide poisoning, and residential injuries.

State and Local Governments

- 1) **CODE ENACTMENT AND ENFORCEMENT** Local and state governments should adopt and enforce the International Property Maintenance Code until such time as a federal healthy homes minimum property standard is established.
- 2) **DIRECT SERVICE PROGRAMS** Public and private agencies conducting in-home visits should be cross-trained to provide healthy homes visual assessments and referrals for their clients.
- 3) **TAX BENEFITS AND FUNDING** State and local governments should offer tax incentives, home repair grants, and favorable financing for property owners to correct health hazards and conduct preventive maintenance. States should reimburse the cost of environmental investigations and interventions for housing related health problems including CO poisoning, asthma lead poisoning, and residential injuries through its Medicaid/ SCHIP funds or other resources.
- 4) **STATE INSURANCE REGULATORS** Require property insurance carriers to provide coverage for environmental health hazards and provide incentives to property owners who achieve the Healthy Homes Seal of Approval.

Private Sector

- 1) **BUILDERS AND AFFORDABLE HOUSING PROVIDERS** Meet USGBC LEED-H or Enterprise Green Communities Criteria (or regional or local equivalent) for newly constructed or substantially rehabilitated homes. Asset managers and developers should incorporate integrated pest management and smoke-free policies in multi-family housing.
- 2) **FINANCIAL INSTITUTIONS** Offer low-interest loans and other favorable financing terms for housing rehabilitation and health hazard mitigation.
- 3) **HEALTH CARE PROVIDERS** When patients may be affected by hazards in the home environment, health care providers should conduct environmental health assessments and recommend appropriate interventions.

- 4) **HEALTH INSURERS** Provide reimbursement for appropriate hazard investigations and interventions for patients with housing-related illnesses.
- 5) **PEST CONTROL COMPANIES** Adopt and market Integrated Pest Management (IPM) as a superior approach to preventing and controlling pest infestation.
- 6) **PROPERTY AND CASUALTY INSURERS** Provide coverage for environmental health hazards and incentivize adherence to the Healthy Homes Seal of Approval and meeting Green Building criteria for new construction and substantial rehabilitation programs.
- 7) **RENTAL PROPERTY OWNERS** Until such time as a federal healthy homes minimum property standard is established, apply preemptive maintenance practices that prevent health hazards and improve durability and energy efficiency, and at minimum remedy any potential health hazards at unit turnover.
- 8) **CONSENSUS STANDARDS ORGANIZATIONS** EPA should submit the Healthy Homes Guidelines through the American National Standards Institute (ANSI) process to establish the guidelines as a national standard. The International Code Council should strengthen its International Property Maintenance Code and International Existing Building Code to include key health and safety considerations.
- 9) **HOME INSPECTORS** Comprehensively check homes for health and safety hazards and educate buyers about potential health hazards and how to address them. Home inspectors should serve as third-party verifiers for the Healthy Homes Seal of Approval.
- 10) **REALTORS** Market homes meeting the Healthy Homes Seal of Approval, the EPA Indoor Air Package labeling requirements, or the LEED-H or Green Communities criteria (or regional or local equivalent).