

National Center for HEALTHY HOUSING

Lead Legal Strategies Partnership Technical Assistance Tool

Opportunities to Strengthen Local Lead-Related Policies: Compare Your Codes

In an ongoing effort to effect change at a systems level and improve outcomes today and for generations to come, the [National Center for Healthy Housing \(NCHH\)](#), [ChangeLab Solutions](#), and [Earthjustice](#) joined forces in 2019 to establish the Lead Legal Strategies Partnership. With funding from [The New York Community Trust](#), the Lead Legal Strategies Partnership mobilizes effective existing resources, data, model policies, and best practices to equip communities with the tools needed to actuate that change.

This series of informal technical assistance tools was developed in reaction to direct coaching requests and ongoing conversations between the [Lead Legal Strategies Partnership](#) and the [Equipping Communities for Action](#) cohort. You'll find the opportunities and real-world examples presented below useful as you work to improve local policies in your area. This concrete, direct glimpse at how other localities have structured policies and processes, combined with a discussion of points to consider as you plan, can guide your first steps as you determine the approach most suitable for your community.

Introduction

There are numerous ways local policies can be used as a lever to motivate and implement positive change and every community's technical assistance needs, ground-level realities, and potential solutions will be unique. However, as a starting point, it is often useful to compare and contrast a range of available actions. Building an awareness of what other communities are implementing, both successfully and unsuccessfully, can help you better design and advocate for policies to advance your goals.

The terms "codes" and "standards" are often used interchangeably; however, there is a distinct difference. Codes generally refer to the building regulations and laws adopted by a jurisdiction; i.e., what must be done, such as homes must have indoor plumbing with a working toilet. Standards provide guidance and set the bar for how codes should be implemented. Standards frequently inform or serve as the future generation of building code regulations. Rating systems are most often just that: a way to rate or determine how well a building performs based on a myriad of criteria. Evidenced-based standards for healthy housing, such as the [National Healthy](#)

[Housing Standard \(NHHS\)](#), can help guide codes, repairs, home assessments, and more. The NHHS is a set of science-based best practice performance standards for safe and healthy homes, featuring healthy home requirements and stretch provisions in seven key categories. It includes explanations for each provision on its public health rationale, along with references for more information. It bridges the health and building code communities by integrating public health information into housing code parlance. It provides health-based measures to fill gaps where no property maintenance policy exists, and complements the International Property Maintenance Code and other established housing policies used by local and state governments. It provides a common foundation of best practice standards but is designed to meet the range of needs faced by different communities.

The Opportunity

There are many ways you can use local housing codes to prevent exposure to lead paint hazards proactively. Housing and health advocates and professionals interested in improving local codes can use the [NCHH Code Comparison Tool](#) to compare

their current housing/property maintenance code to the **National Healthy Housing Standard (NHHS)** and the International Property Maintenance Code (IPMC). Think of it like Turbo Tax for housing codes: You gather and input the necessary information, and the tool generates a customized report identifying where your codes are already strong and where opportunities exist to strengthen them.

Communities can use the **Code Comparison Tool** to self-assess their local housing codes and receive customized recommendations for how to improve and strengthen housing codes to better protect the health and safety of community members.

While we encourage everyone using the tool to complete the whole thing – as it covers many aspects of healthy housing including ventilation, injury prevention, moisture control, and others – the questions about lead hazards can be found in Section E (Chemical Hazards – Building Products). The tool will generate a list of the standards that your code already includes as well as a list of standards that are missing.

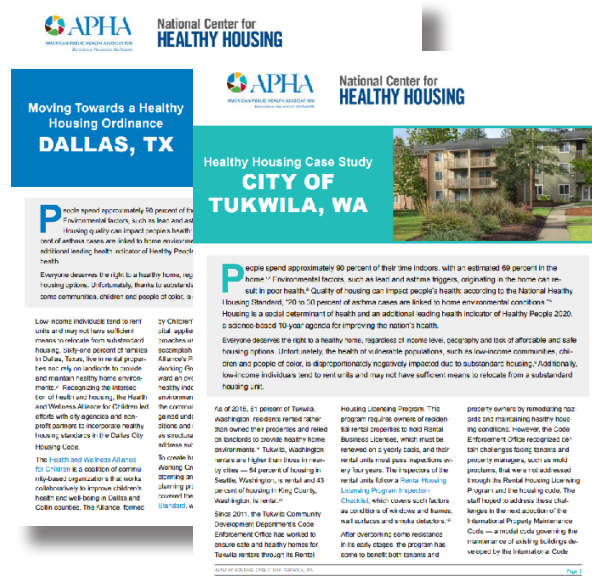
Some Considerations

While the **Code Comparison Tool** (or any comparison of the code's plain language) will provide an understanding of what the code covers, it won't tell you how well any codes program is being enforced or what the city's capacity is. To fully understand your city's situation, it's important to consider factors such as code inspector training protocols, inspection schedules, covered housing unit and inspector capacity, historical compliance with violations, standard enforcement protocols, and much more. As you can see, having strong code language is just one element of an effective, holistic code enforcement system. For information about the other approaches and strategies necessary to having an effective code enforcement program, view **Up to Code: Code Enforcement Strategies for Healthy Housing**, a code enforcement guide published by ChangeLab Solutions.

Additional Information

Once you have your specific recommendations from the **Code Comparison Tool**, some good next steps might be to:

Read about how two communities have already used the NHHS to improve and strengthen local housing codes



<https://nchh.org/who-we-are/nchh-publications/case-studies/learning-communities-case-studies/>

Sample Code Comparison Tool recommendations for Section E: Chemical Hazards - Building Products

SECTION E: Chemical Hazards – Building Products
Questions: 10 | Total Responses: 25 | Answered: 25 | Percentage Complete: 100%

Status: Below Average

E1-E6: Lead
Significant Opportunities for Improvement | Your responses indicate your community may benefit by being more protective of health in this area. You can review the National Healthy Housing Standard (NHHS) provisions in this area – NHHS Provisions (7.1, 7.2, 7.2.1, 7.2.2, 7.2.3, 7.2.4, 7.2.5) to explore ways to improve your code. Consider implementing some or all of the provisions listed below.

E7-E8: Asbestos
Significant Opportunities for Improvement | Your responses indicate your community may benefit by being more protective of health in this area. You can review the National Healthy Housing Standard (NHHS) provisions in this area – NHHS Provisions (7.3, 7.3.1, 7.3.2, 7.3.3) to explore ways to improve your code. Consider implementing some or all of the provisions listed below.

E9-E10: Toxic Building Materials
Significant Opportunities for Improvement | Your responses indicate your community may benefit by being more protective of health in this area. You can review the National Healthy Housing Standard (NHHS) provisions in this area – NHHS Provisions (7.4.1, 7.4.2) to explore ways to improve your code. Consider implementing some or all of the provisions listed below.

SECTION	NUMBER OF NHHS MANDATORY PROVISIONS	NUMBER OF 2015 IPMC PROVISIONS THAT MEET OR EXCEED NHHS PROVISIONS	COMMUNITY SCORE (POINTS ALLOCATED FOR EACH PROVISION THAT WAS PARTIALLY OR FULLY MET)*	COMMUNITY % (COMMUNITY SCORE/NUMBER OF NHHS MANDATORY PROVISIONS)
Chemical Hazards – Building Products	10 (100%)	0%	0.5	5%

*Meets or exceeds standard = 1 point; partially meets standard = 0.5 point; doesn't meet standard = 0 points

- Review example reports from other localities for both informative descriptions of best practices from across the country, as well as analyses of several specific city's opportunities and challenges related to code enforcement practices. You can find several here:

- [How Does Your Local Code Compare](#)
- [Find and Compare State and Local Codes](#)
- [Improving Your Code](#)
- [Technical Assistance for Code Transformation Innovation Collaborative \(TACTIC\)](#)
- [Learning Communities Case Studies](#)

- Dive deep into the components of an effective code enforcement program with the [Up to Code](#) guide noted previously.
- Explore [a list of curated resources](#) that we've collected to help you learn more about various aspects of code enforcement and regulation.
- Learn more about [Healthy Housing Building Codes](#) overall or specifically examine [Healthy Housing Through Proactive Rental Inspection](#).
- Watch this webinar, [Building Better Health Through Improved Housing Codes, Proactive Inspections, and Effective Enforcement](#), to hear more about the role of codes and code enforcement in creating a healthy home environment.
- Discover additional resources from ChangeLab Solutions about [safe, stable, and affordable housing](#).

We gratefully acknowledge the other members of the Lead Legal Strategies Partnership for participating in the development of this technical assistance tool:



ChangeLab Solutions



EARTHJUSTICE

For additional resources and technical assistance tools related to other valuable local policy change opportunities, visit...

<https://bit.ly/LLSPtoolbox>

Technical Assistance Tool

Opportunities to Strengthen Local Lead-Related Policies: Compare Your Codes

This technical assistance tool is part of a Local Policy Tool Box, available at <https://nchh.org/tools-and-data/technical-assistance/lead-legal-strategies-partnership/local-policy-tool-box/>.

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