



Strategies for Continuing Healthy Homes Activities While Social Distancing

Within the healthy housing field, there is an intense interest in learning about innovative adaptations and new ways to continue healthy homes activities during this time of social distancing (also called “physical distancing”). In response to this interest, requests for information and tools, and ongoing conversations between the National Center for Healthy Housing (NCHH) and multiple stakeholders across several of our key initiatives, we’ve published this peer-sharing series entitled Strategies for Continuing Healthy Homes Activities While Social Distancing. The examples highlighted in this series provide not only a firsthand perspective of the exciting work undertaken by this and other change leaders around the country to develop new strategies or layer additional components into larger systems but also a way to contact them for additional information. Use these real-world strategies as a resource to maintain, improve, and expand healthy housing activities or when considering your own local possibilities during this difficult time.

New York City Division of Environmental Health: Conducting Inspections in NYC for Complaints of Unsafe Work Practices While Renovating Residences During the COVID-19 Pandemic

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Strategy Goal

The goal of this strategy is to identify whether lead paint hazards are being created during residential renovation work, as reported from tenants’ complaints to the NYC BAN-LEAD hotline; and where complaints are found to be valid, to counsel landlords and workers on lead-safe work practices, monitor clean-up and compliance, and cite violations, as necessary.

Description

One objective of the NYC Childhood Lead Poisoning Primary Prevention Program (CLPPPP) workplan is to respond to 100% of tenants’ complaints of unsafe work practices and to refer valid complaints to the EPA Region 2 Lead Team for federal enforcement of the EPA Renovation, Repair, and Painting (RRP) Rule. As a result of the pandemic, NYC CLPPPP implemented a revised inspection protocol to address unsafe work complaints while protecting inspector staff, tenants, and construction workers from potential exposure from the coronavirus. Decisions to conduct field inspections and follow-up activities for unsafe work practices complaints were based on the age of the building, successful contact made with the complainant, and building owners and owner’s compliance in response to NYC CLPPPP instructions.

Inspectors were given a supply of PPE* and were instructed on their use. With an aim to minimize the time spent in apartments and building common areas, the following general COVID-safety measures were implemented.

- Inspections for unsafe work complaints are to be conducted in pre-1978 buildings only. Where a complaint is received for a post-1978 building, the inspector phones the building owner to discuss the complaint, provide instructions for cleanup, and request photographic evidence of compliance.
- For complaints in pre-1978 buildings, inspectors contact the complainant (i.e., tenant/resident) by phone from outside the building where the complaint was made to request access for a quick walk-through inspection and to

* NCHH note: Dependent on the sufficient availability of PPE and related procurement funding, minimum recommended protocols for PPE generally involve disposable gloves, mask, gown, and shoe coverings (booties), as well goggles or a face shield. To minimize potential cross-contamination post-visit, PPE should either be wiped with alcohol or removed and placed into a plastic bag for disposal on site prior to entering any vehicles or structures.

conduct risk assessment dust wipe sampling as needed.

- As far as possible, inspectors conduct follow-up discussions on their findings and required follow-up action for compliance with the complainant/contractors/owners from outside the building in person while maintaining a safe distance or by telephone. A script was provided for the inspectors to use.
- Inspectors write inspection reports and complete other paperwork while outside the building.
- Inspectors delivered their dust wipe samples to the laboratory for analysis at the end of the collection day or the first stop on the following day.
- On arrival at the laboratory, inspectors telephone and request that one of the laboratory's technicians come to the lobby to collect the samples and chain of custody forms.
- As part of compliance, landlords are required to provide photographs showing common areas and apartments were cleaned and proper containment was installed. (See photo to the right.)
- Inspectors take photographs of the completed sample chain-of-custody forms after the laboratory technician signs for receipt.
- After cleanup is completed and proper containment is installed, landlords are required to email a compliance letter to the NYC CLPPPP containing the photographs and a detailed explanation of their efforts.
- Inspectors follow up with the complainant (i.e., tenant/resident) via telephone to verify that the cleanup was completed and containment was installed.
- Landlords are allowed to resume work only after cleanup is completed and proper containment is installed.
- Where hazardous lead levels are identified in dust wipe samples, landlord must submit acceptable clearance dust wipe results in order to close the complaint via a third-party dust wipe clearance contractor.



Example of a landlord-submitted photo demonstrating proper containment.

Materials, Supplies, and Capacity Needed

- NYC database for buildings which provide building ownership with contact information, and year of construction.
- Inspectors – Trained and EPA-certified lead risk assessors.
- Telephones – Tenants submit their unsafe work practices complaints via telephone or email. The smartphones issued to the NYC inspectors take still photos and videos of high resolution.
- Laptops for the inspectors.
- Equipment to take dust wipe samples.
- Personal protective equipment (PPE) for the inspectors – masks, gloves, booties, and hand sanitizer
- Electronic copies of lead and healthy homes educational brochures to email to tenants, landlords, and contractors.
- New event/result codes for LeadQuest, the NYC lead registry, were developed to document inspection activities conducted by phone or email instead of in-person in the field.

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