



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

ASSISTANT SECRETARY FOR CONGRESSIONAL
AND INTERGOVERNMENTAL RELATIONS

MAY 15 2018

The Honorable Gwen Moore
U.S. House of Representatives
Washington, DC 20515

Dear Representative Moore:

Thank you for your letter regarding the City of Milwaukee's Childhood Lead Poisoning Prevention Program. You asked the Office of Lead Hazard Control and Healthy Homes (OLHCHH) to assess the city's Childhood Lead Poisoning Prevention Program to ensure compliance with federal requirements and the Department of Housing and Urban Development (HUD) guidelines.

OLHCHH conducted an intensive assessment of the city's performance on its current Lead Hazard Reduction Demonstration Grant, number WILHD0290-16, and its Childhood Lead Poisoning Prevention Program overall. In addition to its regular ongoing remote grant monitoring, program staff:

- conducted an on-site inspection visit;
- performed a thorough grant document review and provided (and continue to provide) regular updates on policy application and resources as document reviews are completed;
- provided written guidance on next steps and templates of documentation that would support their approach from similar grantee programs;
- provided programmatic encouragement to the city's Lead Poisoning Prevention Program managers and staff and conflict resolution assistance regarding the many operational barriers identified;
- connected the city's staff with mentors within other lead hazard control grantees that have or are using an approach to procurement of lead hazard evaluation and control services similar to that used by the city; and
- check in weekly with the grant's Authorized Organizational Representative and staff in addition to responding to questions.

The Department offered to return to the city once the grantee restarts production of lead-safe housing units to examine the implementation of their revised policies and procedures, document the changes the city has made up to that point, and make any recommendations necessary for improving the city's implementation of its grant and its Lead Poisoning Prevention Program overall.

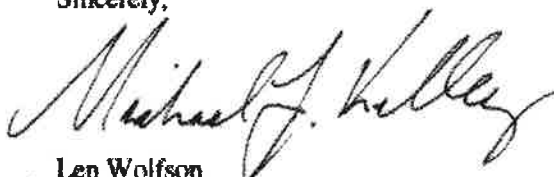
The Department's assessment indicated the city's Lead Poisoning Prevention Program has had significant turnover in leadership and key staff, with the atmosphere volatile and the program slow to respond to HUD guidance and learn from its own experiences. The city responded to the high-risk grant designation and the stop work order on the grant. It has held informational meetings

with its lead hazard control contractor pool regularly to address dust-lead containment procedures and contract procurement issues, and to advise the contractors that new scopes of work will be coming. On the other hand, the city has asked for an extension of the period for providing some of the documents that would show that proper systems have been implemented as needed for us to lift the stop work order. The Department has been disappointed that the city has not devoted more effort and resources to resolving its operational problems so that it can begin to control lead-based paint hazards in housing again. For example, when the order was issued on February 9, the city had enrolled 32 housing units in which it was planning to conduct lead hazard control work, although this was based on deficient scopes of work. The city provided the first re-scoping of work for HUD review a full seven weeks later; in addition, we found that the scope needed additional documentation and hazard assessment. The city submitted its second draft for one of the housing units on April 3, and we approved it as technically satisfactory on April 5 and notified the city that day that it could begin lead hazard control work on that unit. The Department looks forward to receiving additional satisfactory scopes of work from the city.

HUD appreciates your interest in its lead hazard control grant programs that are a key part of the City of Milwaukee's Childhood Lead Poisoning Prevention Program, and the city's efforts to address its managerial and operational difficulties in implementing its lead hazard control grant.

If you wish more information, please contact Shannon Steinbauer, RN, BSN, MPH, Director, Lead and Healthy Homes Program Division, at 202-402-6885 or Shannon.E.Steinbauer@HUD.gov.

Sincerely,


for Len Wolfson
Assistant Secretary for Congressional
and Intergovernmental Relations