



STATE OF RHODE ISLAND
Rhode Island Department of Housing
315 Iron Horse Way Ste. 101
Providence, RI 02908

March 31, 2023

Mr. Kyle Bennett
Chair, Housing Resources Commission

RE: Lead Hazard Mitigation Report

Dear Chair Bennett:

Pursuant to § 42-128.1-5(c)(3), the Housing Resources Commission (“HRC”) is required to submit an annual report no later than March of each year to the Governor and the General Assembly.

With thanks to our partners at the Rhode Island Department of Health (DOH), please find data regarding the Lead Hazard Mitigation Report attached. DOH, through an agreement with the HRC, has assumed responsibility for administration of the Lead Hazard Mitigation functions. The HRC allocated funding in support of administrative costs for assumption of these responsibilities. The DOH coordinates administration of training and enforcement with the agency’s other healthy housing initiatives. Please also note that following the HRC’s authorization to submit DOH’s draft lead hazard mitigation report at its March meeting, DOH has shared additional information, which has been incorporated into the attached report.

Respectfully submitted,

Hannah Moore
Executive Director, Housing Resources Commission

CC: The Honorable Daniel J. McKee, Governor of the State of Rhode Island
The Honorable K. Joseph Shekarchi, Speaker of the House of Representatives
The Honorable Dominick J. Ruggerio, President of the Senate
Utpala Bandy, MD, MPH, Interim Director, Rhode Island Department of Health
Stefan Pryor, Rhode Island Secretary of Housing

Attachment: 2022 Lead Hazard Mitigation Program Annual Report

2022 Lead Hazard Mitigation Program Annual Report

MARCH 2023



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Introduction

The sole public health authority for administering compliance and enforcement of lead laws and the prevention of childhood lead poisoning for the entire State of Rhode Island is delegated to the Rhode Island Department of Health (RIDOH) under *R.I. Gen Law Chapter 42-128.1*¹; *R.I. Gen Law Chapter 23-24.6*²; Lead Poisoning Prevention Regulation (216-RICR-50-15-3)³; Lead Hazard Mitigation Act (RIGL 42-128.1)⁴; and the Lead Hazard Mitigation Regulations (860- RICR-00-00-2)⁵.

The Center for Healthy Homes and Environment (CHHE) is part of the Division of Environmental Health at RIDOH, which oversees lead-related responsibilities. Lead exposure is a persistent environmental health threat. RIDOH's Lead Program has evolved into a three-pronged approach to address and prevent Rhode Island's residents' exposure to lead.

1. Environmental Lead Program (ELP)
2. Lead Hazard Mitigation Program (LHMP)
3. Healthy Homes Lead Poisoning Prevention Program (HHLPPP)

This strategy maximizes different sources of funding and leverages partnerships to increase primary and secondary lead poisoning prevention activities. RIDOH's actions focus on ending social, demographic, and geographical disparities.

Rhode Island's housing stock conditions are the primary source of lead exposure. Nearly 80% of houses were built prior to 1978, with 6% certified as lead-safe. An estimated 1.7% of Rhode Island children had an elevated blood lead level (BLL) higher than 5 mcg/dL for the first time in 2022. Even small amounts of this neurotoxin can have life-long impacts on children, including poorer school performance and decreased earnings during their lifetime.

Although the State has seen tremendous strides in reducing childhood lead poisoning, many children are still exposed to lead daily. An estimated 4% of Rhode Island children entering kindergarten in 2022 have had an elevated BLL. Continued public health action is required to close the disproportionate gap of lead poisoning rates for low-income, minority, and high-risk jurisdictions.

Lead poisoning is occurring in every city and town in Rhode Island. The good news is that childhood lead poisoning is 100% preventable. RIDOH has built strong partnerships with other states, municipalities, federal agencies, and community partners to eliminate lead poisoning.

Lead Hazard Mitigation Program

RIDOH's comprehensive Lead Program has adopted a primary prevention approach for childhood lead poisoning by enforcing property owners' responsibility to comply with [Rhode](#)

¹ <http://webserver.rilin.state.ri.us/Statutes/TITLE42/42-128/INDEX.HTM>

² <http://webserver.rilin.state.ri.us/Statutes/TITLE23/INDEX.HTM>

³ <https://rules.sos.ri.gov/regulations/part/216-50-15-3>

⁴ https://risos-apa-production-public.s3.amazonaws.com/HRC/REG_9819_20180806203732.pdf

⁵ <https://rules.sos.ri.gov/regulations/part/860-00-00-2>

[Island's Lead Hazard Mitigation Regulations \(860-RICR-00-00-2\)](#) through the Lead Hazard Mitigation Program. These regulations mandate compliance with RIDOH's Lead-Safe Standards, demonstrated by a current Certificate of Lead Conformance (CLC).

CLCs are the strongest form of primary prevention in Rhode Island. Owners are issued a CLC after a licensed Lead Inspector evaluates their property for lead hazards and deems it lead-safe. Lead safe is defined as the lead levels in paint, dust, and soil are below the lead-safe threshold ranges established by RIDOH in [216-RICR-50-15-3.7](#). Maintaining lead-safe housing prevents children from ever being exposed to lead.

The management and surveillance of CLCs transitioned from the Department of Administration's Housing Resource Commission (HRC) to RIDOH in 2021. HRC's database and web search feature were disabled in August 2021. RIDOH transferred more than 900,000 HRC records from 2004-2021 and implemented a CLC search feature on RIDOH's website. It is beneficial that the database includes information from RIDOH's Industrial Hygienists (IH) and licensed lead professionals. HRC's system, created in 2004, could not store lead professionals' notes, inspection reports, or certificates. RIDOH's database transmits property information directly to [RIDOH's website](#), enabling the public to see if a property has a lead certificate or a has an unresolved violation before they move in to or purchase a property.

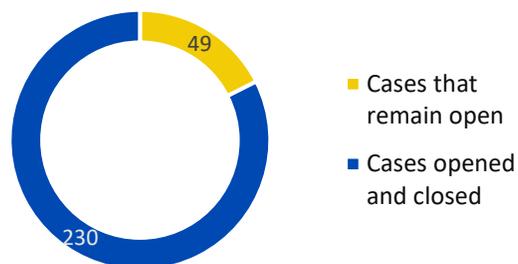
RIDOH has the statutory authority to enforce lead licensure and lead-safe work practice requirements with industrial hygienists performing onsite inspections in the community which we believe results in a more comprehensive and protective lead program. RIDOH launched an improved online system for creating and issuing CLCs, making tracking of lead hazards more accessible and allowed for increased enforcement efforts for rental properties.

Lead Hazard Mitigation Inspection Process

1. Conduct Lead Hazard Mitigation Inspection
2. Identify Lead Hazards
3. Send Notice to Abate
4. Send Order to Correct
5. Refer to Municipal Code Enforcement

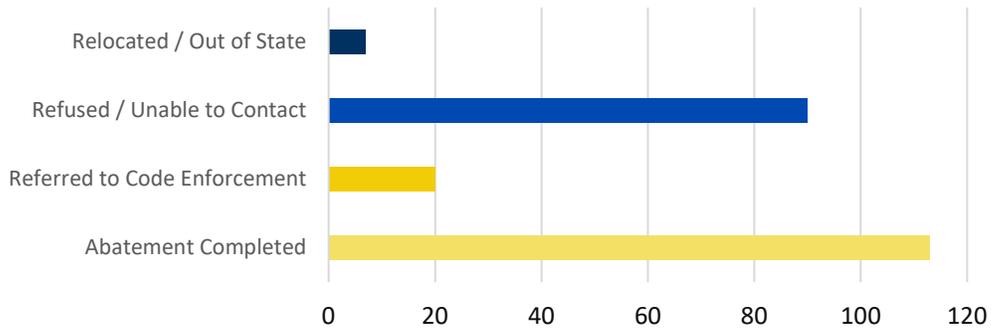
22, 279 Lead Hazard Mitigation cases were opened. Of those cases, 18% (49 cases) remain open and 82% (230 cases) were closed. Open cases are within the 90-day enforcement period or have a pre-approved construction extension.

LHM Cases Opened in 2022



Of the 230 cases that were opened and closed in 2022, 3% (7 cases) the family relocated out of state; 39% (90 cases) were closed because the family refused an inspection or RIDOH was unable to contact the family; 9% (20 cases) were referred to municipal code enforcement; and 49% (113 cases) were closed because abatement of the lead hazard was completed.

Reasons LHM Cases Opened in 2022 Were Closed



Lead Poisoning Prevention Coordination Groups

RIDOH initiated Lead Enforcement Coordination Groups in the core cities of Central Falls, Pawtucket, Providence, and Woonsocket in 2017. These groups on a regular basis and provide a forum for State, municipal, and community partners to discuss address-level data where property owners have been cited for lead violations by the State and/or local Code Enforcement.

The initiative has improved cross-sector coordination between RIDOH, city management, and building code officials. This has augmented services and activities, increased lead safety, promoted lead-safe housing, and protected the Core City’s children and families from lead exposure. The coordination has resulted in 689 units coming into compliance by submitting CLCs. Please note Quarter 4 data for 2022 will not be submitted until April 2023.

Key Performance Indicators

Enforcement

RIDOH’s enforcement capacity has led to increased compliance with the *Lead Hazard Mitigation Act*. State Lead Inspectors are offering Lead Hazard Mitigation Inspections to families who have children with an elevated blood level of 5 – 9 mcg/dL. Before the development of the LHMP, an intervention was only offered when children had a blood lead level of 10 mcg/dL or higher.

State Inspectors refer landlords to resources that can help them correct lead hazards.

1. The property owner is directed to the City of Providence Lead Safe Providence Program, City of Woonsocket Lead Hazard Reduction Program, or Rhode Island Housing’s Lead Safe Homes Program, depending on the property location. HUD-funded programs offer forgivable loans for lead remediation.
2. [Residential Lead Abatement Income Tax Credit](#) information is also shared as a resource. Rhode Island’s personal income tax credit is available up to \$5,000 per dwelling unit for money spent to correct lead hazards.

The LHMP staff partnered with Rhode Island’s Office of the Attorney General to disperse [Guidance for Local Code Enforcement on Lead Hazard Violations](#). The guidance document highlighted the city and town’s authority to issue a Notice of Violation if a pre-1978, non-exempt property does not have a Certificate of Conformance. In cases where a child’s blood lead level is 5 - 9 mcg/dL, non-responsive landlords are referred to local code enforcement for a field visit. Pursuant to [Section 305.3 of the Property Maintenance Code](#), local code enforcement can enforce lead safety requirements of the *Lead Hazard Mitigation and Lead Poisoning Prevention Acts*. Code officials cite landlords when they do not have a valid CLC.

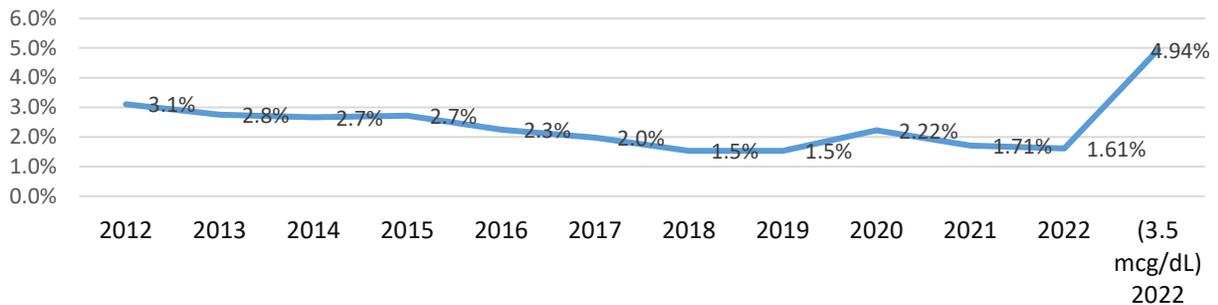
Increase in Certificates of Conformance

There has been an increase in the number of units with valid CLCs. In the LHMP’s second year, 5,043 CLCs were issued by private and State Lead Inspectors. In the Program’s third year, there were 5,592 CLCs issued.

Incidence Rate of Lead Poisoning in Rhode Island

RIDOH tracks and reports the cases where children younger than six who had not previously been poisoned. Implementing successful policies targeting primary and secondary lead poisoning prevention has contributed to a substantial reduction in the lead poisoning rate of children younger than six. There has been a 57% decrease in new lead poisoning cases in the last 10 years. During the COVID-19 pandemic, Rhode Islanders spent more time at home than they normally would because they felt safe there; however, many children were spending this time in unhealthy housing. At the same time, there was a 24% decrease in screening rates. **As a result, there was a 22% increase in new lead poisoning cases in 2020.** This is the first time in 10 years that the incidence of childhood lead poisoning in Rhode Island has increased. Although incidence declined in 2021-2022, the post-pandemic incidence rate is as high as it was in 2017.

RI Statewide Incidence for Children < 72 Months with BLL ≥ 5 mcg/dL



Increase in Lead Professionals

There were 52 Lead Professionals in LHMP's second year. This number increased by 10 professionals in the Program's third year. The number of Lead Professionals is expected to increase as demand for inspection and remediation allows.

Education and Outreach

The most important step of our intentional outreach is educating parents, caregivers, healthcare providers, and public health professionals on preventing lead exposure before it occurs. RIDOH has conducted education and outreach with the following objectives:

1. Increase lead screening rates.
2. Increase home repair lead-safe practices.
3. Decrease lead poisoning cases.
4. Increase lead-safe housing.
5. Increase awareness of funding assistance to correct lead hazards.
6. Increase the number of properties with CLCs.

RIDOH recognized National Lead Poisoning Prevention Week with messaging on its social media pages to increase awareness about the unnecessary, negative health impacts of lead exposure and highlight interim and long-term solutions. RIDOH and City of Woonsocket staff participated in a [RIDOH Public Health Outloud podcast episode](#) about lead poisoning. The National Lead Poisoning Prevention Week overlapped with the CDC Environmental Public Health Track or Treat campaign. Track or Treat used light-touch humor to increase awareness of health topics in the Tracking program. RIDOH's Lead Team collaborated with the Rhode Island Tracking program to develop graphics and lead messaging for the campaign.

Campaign Objectives

1. Increase lead screening rates
2. Increase lead-safe practices in home repairs
3. Increase the number of CLSs
4. Decrease lead poisoning cases

Target Audiences

Parents with children younger than six and childbearing-aged women

Daily Themes

Messages modeled after CDC and EPA Toolkits

Get the Facts about Lead Poisoning



Lead can be found inside and outside the home in



Paint



Dust and soil



Water



Objects such as pottery, old furniture, toys, and spices.

Lead is toxic, especially in young children and people who are pregnant.

Lead poisoning occurs when lead enters the body and builds up to toxic levels. No safe amount of lead in the body has been identified.

Lead poisoning is preventable.

Know the facts.

Get your home inspected.

Get your child tested.



Learn more at health.ri.gov/lead

Get Your Home Inspected for Lead



82% of renter-occupied homes in Rhode Island were built before 1978



77% of owner-occupied homes in Rhode Island were built before 1978



If your home was built before 1978, it most likely has lead-based paint. When lead-based paint chips, peels, cracks, or turns to dust, small children can swallow it or breathe it in.

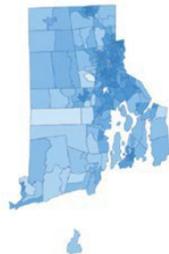
You can get your home inspected for lead-based paint by a certified lead professional.



Learn more at health.ri.gov/lead

Do you live in a home built before 1978 in Woonsocket?

Woonsocket Healthy Housing Composite Score Index, 2016-2019



- Homes built before 1978 most likely have lead-based paint. It's toxic, but it can be fixed.
- Funding and expertise are available to help you fix lead-based paint from the City of Woonsocket's Lead Hazard Reduction Program. Contact Woonsocket City Hall for more information.

This program is funded by the City of Woonsocket through the US Department of Housing and Urban Development.



Learn more at health.ri.gov/lead

Social Media Message Examples

Community partners

RIDOH has collaborated with community partners to amplify and maximize messaging.

Partners reposted RIDOH's social media messaging to increase the number of engaged people, expanding our reach.

- Childhood Lead Action Project (CLAP) is an advocacy group that aims to eliminate childhood lead poisoning in Rhode Island through community-based education, parent support, and organizing.
- City of Central Falls Communication's Director
- Central Falls School Department
- RI Housing is a HUD-funded lead remediation program offering forgivable loans for lead-related home improvements.
- Rhode Island Parent Information Network's (RIPIN) Communications Director

The partnership with the City of Central Falls Communications Director evolved into a [RI Department of Health: Environmental Lead Program](#) webpage on the City's website.

Program information was incorporated in KIDSNET publications, [KidsCount Data Book](#), and expanded the intersections of housing and health chapter in [Housing Work RI's Fact Book](#).

Future Initiatives

Expanding Enforcement Efforts

Historically, RIDOH has referred non-responsive landlords with lead violations to the Office of the Attorney General when a child is found to have an elevated blood lead level of 10 mcg/dL or higher. In 2023, RIDOH plans to propose that the Office of the Attorney General offer enforcement assistance to respond to a lower standard of 5-9 mcg/dL. This effort will increase the number of lead-safe housing available to Rhode Islanders.

Adopting a Lower Threshold

There is no safe level of lead established. Historically, RIDOH has an intervention process in place for when a child is found to have a blood test result of > 5 mcg/dL. The CDC recently recommended lowering the action blood lead reference value threshold to 3.5 mcg/dL. RIDOH intends to follow CDC's leadership and has started directing healthcare providers to consider results of 3.5 -4.9 mcg/dL elevated and to prioritize doing a new screen within three months. RIDOH is also exploring extending its non-medical case management to all children with blood lead levels of 3.5-4.9 mcg/dL.