

ENVIRONMENTAL INVESTIGATION PROTOCOL FOR CHILDREN WITH ELEVATED BLOOD LEAD LEVELS

SECTION 1: INTRODUCTION

This EBL Environmental Investigation protocol was developed as a standard of care for health departments in Michigan to apply during property-based investigations of children with elevated blood lead levels. This standard of care will impart a quality service to the public and ensure a comprehensive investigation designed to identify the probable causes of the child's lead poisoning, and recommend a range of solutions to protect the child from further exposure and harm.

Lead paint hazards that have poisoned a child are implicitly considered an imminent danger according to Michigan Compiled Law 333.2251 of the Public Health Code Act 368 of 1978. Imminent danger is defined as *an existing condition or practice which could reasonably be expected to cause death, disease, or serious physical harm immediately or before the imminence of the danger can be eliminated through enforcement procedures otherwise provided*. Upon this determination, public health departments should inform parents/guardians of lead poisoned children of the imminent danger presented by lead-based paint hazards. The department should issue an order that incorporates the investigation findings and requires immediate action necessary to correct or remove the danger. The order may specify action to be taken or prohibit the presence of persons in locations where the danger exists, except persons who correct or remove the imminent danger.

Health departments may order lead hazard removal citing an existing local ordinance, Michigan's public health code, and/or the Landlord Penalty Law (MCL 333.5475a) using the corrective action options that are listed in the Environmental Investigation report.

I. PRINCIPLES of the EBL ENVIRONMENTAL INVESTIGATION

An EBL Environmental Investigation (EI) consists of a Lead Inspection and Risk Assessment, as a base service, with the addition of the following elements:

- The purpose of the investigation is to identify all probable causes of the lead poisoning in order to protect the child from further exposure and physical harm.
- The scope of the investigation focuses on all sources of lead in the child's environment, including household items (i.e., ceramics, cultural/medicinal remedies, occupational take-home sources), and other places the child frequents. An extensive interview with the primary caretaker is conducted to collect this data.
- The environmental sampling plan for dust and soil must take into account the child's behavior and other occupant use patterns.

According to Michigan law, specific work practice standards must be followed when performing an Environmental Investigation. These work practice standards are documented in the following references: The US Department of Housing and Urban Development publication entitled *Guidelines for the Evaluation and Control of Lead-Based Paint Hazards in Housing (July 2012)*; the American Society for Testing and Materials publications entitled *Standard Practice for Field Collection of Soil Samples for Lead Determination (Standard Number E1727-05)* and *Standard Practice for Collection of Settled Dust Samples Using Wipe Sampling Methods for Subsequent Lead Determination (Standard Number E1728-10)*; and the Michigan Department of Health and Human Services (MDHHS) field guide entitled *Environmental Investigations for Children with Elevated Blood Lead Levels*.

II WHAT INITIATES an EBL ENVIRONMENTAL INVESTIGATION?

Michigan law (R 325.99102(1)(a)) states that an Environmental Investigation means both a study, for case management purposes, of the living environment of one or more children six years of age or less with an elevated blood lead level performed by an EBL investigator to identify causative lead exposures, and the provision of a report by the EBL investigator explaining the results of the study and options for remediation of exposures. If any sampling of paint, soil or dust is performed, an Environmental Investigation of the entire housing unit and common areas, if any, must be conducted.

In 2012, the Centers for Disease Control (CDC) and Prevention updated its recommendations on children’s blood lead levels to include a reference value of 5 ug/dL and higher. Depending upon public health resources, an Environmental Investigation may be performed in response to venous blood lead levels as low as 5 ug/dL.

III TIME FRAME for EBL ENVIRONMENTAL INVESTIGATIONS

MDHHS recommends the following timeline for initiation of environmental investigations triggered by knowledge of venous blood lead levels:

Blood Lead Level	Time from Referral to Home Visit
15-19 ug/dL – one lead test	Within two weeks
15-19 ug/dL – two lead tests over 3 months apart	Within one week
20-44 ug/dL	Within one week
45-69 ug/dL	Within 48 hours
≥70 ug/dL	Within 24 hours

IV CERTIFICATION REQUIREMENTS

All persons performing Environmental Investigations must be certified by the Michigan Department of Health and Human Services (MDHHS), Healthy Homes Section (HHS) in the discipline of Environmental Investigator. Pre-requisites to becoming a certified Environmental Investigator include Michigan-issued Lead Inspector and Risk Assessor certifications.

The Environmental Investigation certification requires passing an open-book state exam initially and every three years thereafter. Certification requirements, funding availability for training

costs, and application forms are available at www.michigan.gov/leadsafe > Lead Professionals > EBL Environmental Investigation home page. Certification program staff can be contacted at 517.335.9390.

V X-RAY FLUORESCENCE (XRF) LEAD ANALYZER

An XRF lead paint analyzer is required to compliantly conduct an Environmental Investigation. The MDHHS/Trace Metals Laboratory is no longer accredited to analyze paint chip samples. An XRF analyzer is available for short-term loan from the Healthy Homes Section. Program staff can be contacted at (517) 335-9390 prior to scheduling an Environmental Investigation in order to coordinate transfer of the analyzer.

VI ENVIRONMENTAL and PUBLIC HEALTH NURSING COMMUNICATIONS

In order to ensure the best coordination of care for the lead poisoned child, the Environmental Investigator and public health nurse assigned to the case should be communicating regularly. The investigator should inform the nurse of any background and child data collected, in addition to the findings of the Environmental Investigation.

VII WHEN a CHILD IS HOSPITALIZED for LEAD POISONING

When a child is hospitalized for treatment of lead poisoning, the EBL investigation should be initiated within 24 to 48 hours if the child will be returning to the same home. If lead hazards are found, efforts for immediate removal of those hazards should be made so the child can return to a lead-safe environment. Ideally, a state-certified abatement company should perform these activities; however, interim controls can also be used to satisfy lead paint repairs. The interim control guideline can be found at www.michigan.gov/leadsafe > [State-certified Lead Professionals](#) > [EBL Environmental Investigators](#). The guideline is entitled, *Procedural Guidelines for Accommodating the Housing Needs of Families with Lead Poisoned Children Undergoing Chelation Therapy*.

If alternate lead-safe housing is identified, the investigator should assess the property for safety with respect to lead hazards, isolation of the lead sources and chronicity of the lead exposures.

Communication with the treating hospital is essential to ensure that the child is released to a lead-safe environment; most hospital policies will not allow discharge until lead-safe housing is located.

VIII MEDICAID REIMBURSEMENT

If the child is enrolled in Medicaid, certain lead services may be reimbursable to local health departments. The Michigan Medicaid Provider manual, including bulletins and forms, can be found electronically at <http://michigan.gov/medicaidproviders>. MDHHS/Medicaid Program Provider Support can be reached at 1-800-292-2550.

IX CONFIDENTIALITY and FREEDOM of INFORMATION ACT REQUESTS

When EBL Environmental Investigation information is requested under the Freedom of Information Act (FOIA), Michigan's Lead Abatement Act covers specific exemptions. The information described in sections (a), (b) and (c) below must be redacted prior to responding to the requestor.

MCL 333.5473(a)(5): Lead Abatement Act – Administration and enforcement of part by department; rules; establishment of programs; recommendations; information exempted from disclosure as public record

(5) The following information required to be submitted to the department by certified individuals and persons under this part and rules promulgated under this part is exempt from disclosure as a public record under the Freedom of Information Act, 1976 PA 442, MCL 15.231 to 15.246:

(a) The name, street address, and telephone number of the owner, agent, or tenant of a residential dwelling where lead-based paint investigations have been conducted.

(b) Information that could be used to identify 1 or more children with elevated blood lead levels that have been reported to the department.

(c) Information contained in an EBL investigation report that could be used to identify 1 or more children with elevated blood lead levels.

The above information can be shared between health agencies and the child's medical home to ensure the best quality of care for the child. However, if a FOIA request from a business or person (other than parent or legal guardian) is received, this part of the law applies.

Local health agencies should discuss confidentiality issues and the relevance of the Health Insurance Portability and Accountability Act laws with their legal counsel.

X TECHNICAL ASSISTANCE and RESOURCES

HHS staff is available for technical consultation relating to Environmental Investigations. Courtesy reviews of EBL reports and hands-on consultations in the field for EBL cases are available. Contact the Healthy Homes Section 517.335.9390 to coordinate assistance. EBL Environmental Investigators are held to the same compliance standards as Michigan-certified Lead Inspectors and Risk Assessors.

Resources are available on the Environmental Investigator webpage at www.michigan.gov/leadsafe > Lead Professionals > EBL Environmental Investigation hereby called the Environmental Investigators' home page throughout this protocol. This webpage contains protocols, procedures, templates, and references for conducting an EBL Environmental Investigation and writing the report findings. These documents are updated regularly. Periodic announcements are also emailed to state-certified Environmental Investigators.

SECTION 2. PREPARATION FOR THE HOME VISIT

I OPENING a CASE

The investigator may start the case file by populating the *Environmental Investigation Summary for Children with Elevated Blood Lead Levels*. This form can be found on the EBL Investigator's webpage. This form captures basic data about the case. Ensure the data is obtained from credible sources.

- Venous blood lead levels should be verified with public health nursing or the Michigan Department of Community Health. Capillary samples do not trigger home visit services for lead. Environmental Investigations should only be conducted on units where children have venous blood lead levels at or above 5 ug/dL.
- Dwelling information (age/ownership) should be obtained from the city or county assessor's office.
- It may be useful to identify existing social or cultural issues specific to the household.
- An XRF analyzer is required. If one is not available from your agency, contact the MDHHS/Healthy Homes Section at 517.335.9390 in advance of scheduling a home visit to coordinate an XRF analyzer loaner.

Coordination with Public Health Nursing

Public health nurses are responsible for case management of the child and family. Identify this individual so that any information can be obtained or shared about the case child. The nurse should be informed of any background and child data collected by the investigator. Investigative and public health nursing services can be coordinated or performed separately.

II CONTACTING the FAMILY

EBL Environmental Investigation Activity Log and Check List

An activity log should be posted in the case file to document actions, conversations, and other information pertinent to the case. In addition, a check off list is available as a resource for a quick look at progress made and the next steps to accomplish. Blank log sheets and the check list can be found on the EBL investigators home page.

Recently Vacated Rental Units

If the family with the lead poisoned child has moved from the subject property before an Environmental Investigation can be done, consult with the health department's legal counsel for advisement on how to proceed. Michigan's Landlord Penalty Law (MCL 333.5475a) is applicable when the lead poisoned child is living in the unit at the time the environmental samples are taken.

Refusal to Permit Access

If the property owner and tenant refuse to permit access to the property, consult with the local department's legal counsel. Some strategies to consider are:

- Contact a public health nurse or a social worker for assistance.
- Contact the local Department of Human Services office communicating that the property is potentially endangering the health of the child. The parents/caretakers are refusing to allow assessment of the risk, and may be further endangering the child.
- Contact the child's school administration to discuss the issue, and request assistance in mediation with the family to gain access to the home.
- If the rental property owner is refusing access, contact the local building safety department to determine if assistance can be provided.
- An administrative warrant of inspection under the eminent danger clause of the public health code can be exercised. A district attorney would coordinate the warrant procedures with their respective state attorney.

III PREPARING FIELD MATERIALS

XRF Analyzer

An XRF analyzer is required to conduct the investigation. Contact the MDHHS/Healthy Homes Section at 517.335.9390 in advance of scheduling the home visit to coordinate an XRF analyzer loaner, if one is needed.

Environmental Investigation Field Forms

The following documents are needed for the environmental investigation and should be brought on-site. They are available at the EBL Investigators' home page. The local health department may require additional forms.

- *Consent to Enter Property and Take Samples - Optional*
- *Environmental Lead Sampling Request (DCH-0558)*
- Building condition, paint condition and household questionnaire
- Floor plan and site plan templates
- MDHHS/Lead Lab dust and soil collection protocols

Sampling Materials

Environmental sampling materials are needed to conduct an investigation. At a minimum, a tray of 25 centrifuge tubes, a box of 100 dust wipes, and a box of disposable gloves should be on hand. A digital camera will be needed for photodocumentation in the EBL report.

XRF Paint Analyzer User's manual, NIST Standard calibration materials

Dust Sampling Disposable gloves, dust wipes and 50 ml centrifuge tubes from the MDHHS/Lead Laboratory, tape measure, template, tape

Soil Sampling 50 ml centrifuge tubes from the MDHHS/Lead Laboratory

Protocols for taking dust and soil samples and XRF paint testing should be reviewed prior to the field visit. The sampling protocols should also be on site for reference. Full protocols and summarized field guides are on the EBL Investigators' home page.

Educational Materials

Education materials should be provided at the visit. Recommended materials include the following:

- Understanding Your Lead Investigation
- A Guide to Cleaning Up Lead Paint Chips and Dust
- How to Make a Home Lead-Safe
- Coping with Your Child's Diagnosis of Lead Poisoning

These documents are available at the EBL Investigators' home page.

SECTION 3. ON-SITE ACTIVITIES

It is advised to obtain written permission from the parent or child's guardian to enter the property and take environmental samples. A sample form is available on the EBL Investigators' home page.

I INTERVIEW HOUSEHOLD

Visit Overview

The investigator should wear official identification. As with any governmental personnel making home visits, if personal safety becomes an issue, the investigator should leave immediately. If child abuse is suspected, the investigator should consult the local department's legal counsel for policy and guidance on whether to report.

Items to discuss with the parent/guardian include:

- The purpose of the visit and why the lead exposure to the child may be from the home
- Access to all rooms of the home and yard. Pets on the property should be secured.
- Be responsive to the client's questions and concerns.
- Follow-up blood lead testing, as recommended by the child's doctor or clinic, is important.
- Give the time frame for their receiving the findings of the investigation.

- Discuss the safety measures that will need to be followed during the visit relating to the XRF analyzer (i.e., no occupants behind walls being tested; children must stay behind the XRF rather than in front).

Administer Household Questionnaire

The interview questions are available on the EBL Investigators' home page, as a standalone document, and are embedded in the EBL investigation report template.

Explain to the parent/guardian that the questions are good predictors of finding the possible sources of lead poisoning. Explain there is concern for the child and eagerness to find and stop the lead exposure. Before starting, explain why the questions are being asked, and talk about the risk factors before asking each set of questions. Consider teachable moments while administering the questionnaire. Record observations that differ from self-reported answers. Note that the questionnaire includes prompts for the investigator to test items with the XRF analyzer.

II ENVIRONMENTAL EVALUATION of LEAD SOURCES

An environmental investigation incorporates a full lead inspection/risk assessment (LI/RA) as required by Michigan's Lead Abatement Act. The lead inspection/risk assessment requires: 1) determination of lead-based paint hazards by sampling house dust, paint, and soil, and 2) recommendations to remediate those hazards. The Environmental Investigation takes the LI/RA one step further in evaluating additional lead exposure to household items and activities that are encountered in the child's living environment (e.g., pottery, hobbies, occupational take-home exposure).

Property Description and Building Condition

Record observations on-site. Window, door and other housing component identification sheets are on the EBL Investigators' home page, if needed.

Site and Floor Plans

Draw the site and floor plans while in the field. The site plan contains the residential dwelling, yard and outbuildings. The floor plans detail separate floors and individual rooms within the dwelling. Blank floor plan sheets are available on the EBL Investigators' home page. Plans can be hand drawn or created with Microsoft Word or a computer-aided design program.

Photographs

Photographs are required. Photos will enhance visual memory, reduce questionable data and can be referred to when writing report findings. Up-close photos of typical hazards should be taken. Photos to be included in the report include: each exterior side of the home, representative lead hazards throughout the home, bare soil and play areas, and household items found to contain lead.

Paint

An XRF paint analyzer is required for the lead inspection and personal property components of the EBL investigation. A field reference guide on XRF testing and a tutorial on paint condition designation (i.e., intact and deteriorated) are on the EBL Investigators' home page.

If using an XRF on loan from MDHHS, data should be downloaded onto a compatible computer by the next business day so that the XRF can be returned to MDHHS. Verify the readings prior to erasing the data from the XRF analyzer. Data should be erased before shipping back to MDHHS. If assistance is required, contact the Healthy Homes Section at 517.335.9390.

Dust

Dust sampling is required. Dust is the best indicator of current lead hazards and exposure in a child's environment. A field reference guide and the dust sampling and submission protocols are posted on the EBL Investigators' home page.

Soil

Soil sampling is required. A field reference guide and soil sampling and submission protocols are posted on the EBL Investigators' home page.

Snow cover may not permit sampling of bare soil. Per Michigan law, the investigator must return to the property when conditions permit to obtain the appropriate soil samples.

Water

In Michigan, water is typically not found to be a significant source of exposure in lead poisoning cases. If there is reason to believe that the tap water may be a significant source, test the water. Additional information, materials, procedures, and pricing can be obtained from the Michigan Department of Environmental Quality's Drinking Water Laboratory at (517) 335-8184.

MDHHS will not reimburse the local health department for the cost of water analyses. This is an expense that the local health department will incur, or it can be paid for by the client, rental property owner or other source.

III EXPLORATION of ALTERNATIVE SOURCES

In addition to painted building components, dust and soil, the investigator must survey other potential sources of lead exposure to the child. This is accomplished through the administration of the household questionnaire and testing suspect personal property. Some potential sources include ceramics, mini blinds, toys and hobby products. The XRF or chemical spot tests should be used to test these materials, rather than sending samples to the MDHHS Lead Lab for analysis.

IV WRAPPING UP the HOME VISIT

Lead Sources Found During Visit and Explanation of Potential Sources

Discuss the initial findings with the parent. Discuss where you suspect the lead hazards are located, which will be verified in the EBL report to follow.

Education

Provide initial recommendations for making the home environment lead-safe for the child. Discuss specialized wet cleaning techniques for lead dust removal and dust control. Use of a HEPA (high efficiency particulate air) vacuum should be mentioned.

Discuss exposure prevention based on suspected household items found. Make recommendations that are easily done, inexpensive and effective.

Leave materials that explain cleaning, exposure reduction, and lead poisoning prevention in an appropriate language and comprehension level. Materials are available for download on the EBL Investigators' home page and www.michigan.gov/leadsafe.

Discussing Follow-up with the Parent/Guardian

The time line for receiving the EBL report and recommendations for lead hazard control should be discussed with the parent/guardian.

Assessing a secondary site should be considered if the primary residence of the subject child does not contain lead hazards or sufficient lead hazards to have poisoned the child. This should be evaluated after all environmental sampling results are known. Secondary sites are typically a relative's home or a child care setting.

SECTION 4. SAMPLE IDENTIFICATION AND SUBMISSION

The EBL investigator should submit dust and soil samples collected during the EBL investigation to the MDHHS/Trace Metals Section Lead Laboratory. The local health department will not be charged for the sample analyses submitted to the lab.

Dust wipe and soil sample labeling and submission protocols and forms are posted on the EBL Investigators' home page. A submitter code is required in advance to send samples to the lab. Contact the lab at 517.335.8244 for inquiries.

SECTION 5. REPORTING RESPONSIBILITIES

Templates for writing the EBL investigation report and cover letters for parents (homeowners) and rental property owners are located on the EBL Investigators' home page.

I REPORTING to the PARENT/GUARDIAN

The investigator is responsible per Michigan law to prepare a report for the parent or guardian of the lead poisoned child. The report should be mailed or hand delivered within 20 business days from the time that the lab result reports are received. A follow-up phone call is advised to answer questions and reiterate key prevention messages.

II REPORTING to the RENTAL PROPERTY OWNER

The investigator has a legal responsibility to submit an investigation report without confidential information to the rental property owner. This report should also be submitted within the same time period stated above, and be sent with delivery confirmation to document receipt. If the property owner cannot be verified, contact MDHHS/HHS at 517.335.9390 for assistance.

If the tenant family has moved since the home visit, the investigator remains obligated to mail the report to the property owner.

III SECONDARY SITES and REPORTING

If the investigator has assessed a secondary site, the parent/guardian should be provided the EBL investigation report for that property. The owner of the second property should also receive that same report without confidential information about the child. The investigator is not obligated to provide the report to occupants residing at the second property; however, if it is requested, the property owner's version can be provided, or the occupants can initiate a Freedom of Information Act request to the local health department for a copy of the report.

IV REPORTING and OTHER ENTITIES

Public Health Nursing

The investigator should communicate the case findings to a public health nurse at the health department. In the event that a Freedom of Information Act request is made for a case file, all confidential information about the child must be redacted before it is released per Michigan law (MCL 333.5473(a)(5)).

Child's Medical Home

It is suggested that communication be initiated with the child's medical home to inform that the health department provided environmental assessment services to the family identifying the

potential sources of the poisoning and recommending ways to fix the lead hazards found.

Tenant-Based Rental Assistance Programs (Housing Choice Voucher Program, formerly Section 8 Housing) and HUD 24 CFR Part 35 Regulation Compliance

HUD 24 CFR Part 35 is a Federal law that requires certain actions be taken by the rental property owner and the administering housing agency when a lead poisoned child is identified as living in a participating unit. In order for action, the child's venous blood lead level must be at least 20 ug/dL with a single test or two consecutive tests between 15-19 ug/dL within a 3-month time period. Within 15 days of being notified, the administering agency must conduct a risk assessment of the property and require that the owner use interim controls or abatement to treat the identified lead hazards. The EBL Environmental Investigation report can be used in lieu of a risk assessment. Within 30 days of receiving the risk assessment report, the property owner must complete the lead hazard treatments using a State-certified lead abatement company. If the family moves out before the hazard treatments are made, the property owner is still responsible for treating that unit for lead hazards. The hazard reduction is complete after abatement clearance has been achieved. For inquiries regarding compliance with HUD 24 CFR Part 35 regulations, contact HUD's Michigan office at 313.226.4343.

The health department is not under obligation to assure compliance; however, may want to follow-up with the administering housing agency and the property owner to ensure that the property is remediated.

Housing Code Enforcement

This is a resource that can be used if code enforcement is the desired outcome. Each case should be evaluated to determine the potential effectiveness of the outcome. It can be utilized for rental properties. If code enforcement is initiated, an inspection will be conducted by a building inspector. The property owner will be mandated to fix housing code violations. Repairs are likely to be far more than lead paint hazards.

The EBL investigator can contact code enforcement in a consultation capacity to determine if other enforcement actions are pending against the rental property owner. Either the tenant or the health department can request an inspection of the property by code enforcement. The health department should consult their legal counsel.

Michigan Occupational Safety and Health Administration (MIOSHA)

If the EBL investigator has reasonable evidence that an occupational take-home source may be contributing to a case child's exposure, a referral can be made to MIOSHA for potential investigation and enforcement. Reasonable evidence of an occupational take-home source may include detailed information collected during the household questionnaire and dust wipe testing of clothing or other work-related items that are brought into the child's environment. The EBL investigator can contact MIOSHA/General Industry Safety and Health Division at 517.322.1831 to discuss the issue with an industrial hygienist or supervisor and make a referral, if necessary.

Michigan Department of Health and Human Services, Healthy Homes Section

To be compliant with Michigan law, the investigator must email an activities report to the Healthy Homes Section by the 15th of the month following the prior month's lead activities. The electronic form is available on the EBL Investigators' home page.

SECTION 6. LEAD HAZARD CONTROL RESOURCES – LOCAL AND STATEWIDE

There are several housing-based programs that can serve as potential resources for the abatement of lead hazards. Some of these programs may be offered as grants, while others may require match dollars from the home owner or may be structured as low-interest loans. Some programs only provide remodeling or renovation services, which consequently can reduce lead hazards. These resources should be provided to the client and/or rental property owner to assist in making the most permanent hazard reduction activities possible.

MDHHS, Lead Safe Home Program - This program provides lead hazard control services to households throughout Michigan. State and Federal funding and target cities/counties can vary from year to year. Contact the program at 517.335.9390 or 866.691.5323 to learn more about availability. The website is www.michigan.gov/leadsafe.

Michigan State Housing Development Authority, Property Improvement Program - The Property Improvement Program offers low-interest loans for lead hazard control work in rental and owner-occupied properties. Credit and debt to income ratios are evaluated for this loan. Contact MSHDA at 517-373-6840 for eligibility and terms of the program. The website is www.michigan.gov/mshda > [Home Improvement](#).

Community Development Block Grant Programs - Local housing rehabilitation agencies often have Community Development Block Grant funds, other free funding or loan programs to support housing rehabilitation activities in rental or owner-occupied housing. Housing rehabilitation activities can also eliminate lead hazards, depending upon the work (e.g., window replacement and porch rebuilds).

MDHHS/Weatherization Assistance Program – Weatherization programs will not directly address lead hazards; however, they can indirectly assist in making a home safer regarding lead. The Weatherization Assistance Program requires an audit to be conducted on eligible homes to determine which energy efficiency measures can be added to the home. The most common measures include wall insulation, attic insulation and ventilation, foundation insulation, air leakage reduction, smoke detectors, dryer and dryer venting. To ensure lead-safe work practices, the Weatherization Assistance Program performs technical cleans on older homes and lead dust clearance must be achieved to complete the project. Weatherization workers receive lead-safe work practices training and Lead

Renovator Training. The Weatherization Assistance Program is structured as an income-based program giving preference to households that have occupants that are disabled, elderly, or families with children. The Program weatherizes owner-occupied, renter-occupied, and multifamily units. Rental property owners must agree to have their units participate in the program and sign landlord agreements to ensure tenant occupancy after weatherization work has been completed. Any work on rental units requires installing only measures that are necessary for energy efficiency. Visit http://michigan.gov/dhs/0,4562,7-124-5453_5531_7211-58707--,00.html for program details. Call Michigan Community Action at 517.321.7500, or visit their website at www.mcaaa.org to identify a local program.

MDHHS/Emergency Relief Program – The State Emergency Relief (SER) Program provides immediate help to individuals and families facing conditions of extreme hardship or for emergencies that threaten health and safety. Through a combination of direct financial assistance and contracts with a network of non-profit organizations such as the Salvation Army and local Community Action Organizations, SER helps low-income households meet emergency needs such as heat/utilities, home repairs and relocation assistance. The SER program is primarily designed to maintain low-income households that are normally able to meet their needs but occasionally need help with unexpected emergency situations. The SER program is not an appropriate solution to ongoing or chronic financial difficulties. Applications for eligibility are available on line or through the local department of human services.

SECTION 7. FOLLOW-UP ACTIVITIES

I PURPOSE of the FOLLOW-UP VISIT

The follow-up site visit is conducted to determine if the lead hazard control recommendations (abatement and/or interim controls) in the EBL Environmental Investigation report were performed satisfactorily to make the environment lead-safe for the child. The investigator should perform this follow-up only if lead hazard control activities were conducted. The interventions are verified by a visual inspection and dust wipe clearance testing. The dust samples should be submitted to the MDHHS Lead Lab for analysis at no cost to the local health agency.

If a secondary site was investigated, a follow-up visit can be conducted at that address as well if lead hazard control activities have taken place.

II VERIFYING LEAD HAZARD CONTROL REMEDIAL ACTION

Within 30 days of sending the EBL investigation report, contact the family to determine if the recommendations in the report were performed. If lead hazard control activities were conducted, a follow-up visit to the address can be done.

MCL 333.5475a requires rental property owners to address lead paint hazards identified in the EBL investigation report within 90 days of receiving the report. If the hazards are not addressed within this time period, the property owner can be prosecuted under civil or criminal law. If the county prosecutor's office is interested in pursuing a case and needs guidance or assistance, please contact the Healthy Homes Section at 517.335.9390.

III FOLLOW-UP ACTIVITIES at the SITE

This activity is intended to determine if attempted lead repairs were done in a lead-safe manner through lead dust wipe testing and laboratory analysis. Verify if lead repairs were made before visiting the home. Lead hazard control clearance procedures outlined in R325.99407 of Michigan's Lead Abatement Act must be followed. The clearance must cover the interior and exterior of the residential unit and the property. First, a visual inspection of the lead hazard repairs outlined in the EBL investigation report should be done. If the visual portion of the clearance passes, the investigator should take dust wipe samples. If there is no interior containment present, a whole-house clearance must be conducted. The dust samples should be sent to the MDHHS Lead Laboratory for analysis.

Lead poisoning prevention messages should be reiterated at this visit. Education materials can be presented to the household again. The Environmental Investigator should communicate to the parent or legal guardian that follow-up blood lead testing of the child with the physician's office or clinic should be done to determine if the child's lead levels are decreasing.

IV REPORTING to the CLIENT

A clearance report per R325.99407 should be mailed by certified letter or otherwise provided to the client. If all of the lead hazards in the EBL report were addressed and cleared, the clearance report should describe the lead-safe condition and clearance of the lead dust testing and visual inspection. If the investigator finds that the lead hazard control recommendations have not been performed or performed incompletely, the follow-up report should specify the actions that still need to be performed. Re-inspection should be conducted at a future time when the corrective actions are made. A clearance report template can be found at the www.michigan.gov/leadsafe > Lead Professionals web page.

V CLOSING a CASE

The investigator's role is accomplished after the field work, household interview, environmental testing and reporting are completed and submitted. Local health department policies may require cases to remain open until additional criteria are met.