

**St. Clair County Intergovernmental Grants
Department
Community Development Division
Comprehensive Lead Policies and Procedures
Manual**



Table Of Contents

Purpose	3
Section 1: General Requirements for Lead Hazard Control	3
Section 2: Tenant-Based Rental Assistance (HOME TBRA)	3
<i>Elevated Blood Lead Level (EBLL) Protocol:</i>	4
Section 3: Continuum of Care (CoC) Housing Assistance	4
Section 4: Owner-Occupied and Rental Rehabilitation (CDBG)	4
<i>Eligibility and Limits:</i>	4
<i>Recission Mortgage:</i>	5
Section 5: Recordkeeping and Reporting	5
Section 6: Anti-Discrimination Policy	5
Appendix I	6
Resources and Guidance	6
Revision History	7

Purpose

This manual outlines the policies and procedures used by the St. Clair County Intergovernmental Grants Department (IGD) to ensure compliance with federal regulations regarding lead-based paint hazards in housing assisted under CDBG, HOME, and CoC programs. The goal is to provide lead-safe housing, particularly for low- and moderate-income households and families with children under age 6.

HUD requires compliance with lead-based paint (LBP) regulations (outlines at [Lead-Based Paint Regulations - HUD Exchange](#)) for all HOME-assisted properties built before 1978 to protect homebuyers from lead hazards. St. Clair County follows [24 CFR Part 35](#) to ensure compliance.

Section 1: General Requirements for Lead Hazard Control

All federally funded housing activities administered by IGD/CD must comply with the lead-based paint regulations under [24 CFR Part 35](#). These requirements include:

- Disclosure of known lead-based paint and lead hazards
- Visual assessments for deteriorated paint
- Risk assessments or lead-based paint inspections, as applicable
- Interim controls or abatement
- Resident notification
- Clearance testing
 - Must be conducted in accordance with [24 CFR Part 35](#) and the revised EPA protocol at [40 CFR Part 745.227\(e\)\(8\)\(v\)](#).

All documentation related to lead-based paint compliance must be maintained in the client/project file.

Section 2: Tenant-Based Rental Assistance (HOME TBRA)

Applicability: Applies to tenant-based rental assistance provided under the HOME Program. These requirements include:

- A qualified inspector must conduct a visual assessment during initial and periodic inspections as required under [24 CFR 92.209](#)
- If deteriorated paint is found, the owner must complete stabilization within 30 days and achieve clearance per [24 CFR 35.1340](#)
- Clearance must be conducted by a licensed risk assessor.
- The owner must provide the clearance results and occupant notices.

Elevated Blood Lead Level (EBLL) Protocol:

- Upon notification of a child with an EBLL, IGD/CD must initiate an environmental investigation within 15 days.
- Lead hazard reduction must be completed within 30 days of receiving the investigation report.
- Other assisted units in the property with children under age 6 must also be assessed and remediated if hazards are found.
- All actions must be documented and reported to HUD and the public health department

Section 3: Continuum of Care (CoC) Housing Assistance

Applicability: Applies to units funded under the CoC Program, including those receiving operating costs. These requirements include:

- Housing must comply with [24 CFR Part 35](#) Subparts A, B, K, and R.
- A visual assessment using the HQS form is acceptable for units assisted with CoC operating funds.
- Landlords must:
 - Sign the Lead Disclosure Form
 - Provide the “Protect Your Family From Lead in Your Home” brochure
 - Remediate any identified hazards and obtain clearance
- Clearance must be confirmed prior to client occupancy.

Section 4: Owner-Occupied and Rental Rehabilitation (CDBG)

Applicability: Applies to units receiving rehabilitation, emergency repair, or lead hazard control assistance under CDBG. These requirements include:

- Visual assessments, risk assessments, and clearances as required by [24 CFR Part 35](#)
- Contractors must be:
 - Illinois Lead Licensed
 - IEPA Certified
 - Adequately insured
 - Approved by IGD or CDBG agency
- Contractor Documentation: All clearance reports must be provided to IGD/CD, the landlord, and/or the property owner

Eligibility and Limits:

- Income-eligible occupants (owner- or renter-occupied) may receive lead remediation.
- Assistance is limited to properties that have not previously received lead remediation.
- Maximum cumulative assistance is \$30,000 per address over a 15-year period.

Recission Mortgage:

- A 5-year recission mortgage will be filed on each project.
- If the property is sold before the 5-year term expires, repayment is required

Section 5: Recordkeeping and Reporting

- All lead-based paint evaluation and clearance documentation must be retained in client files.
- IGD/CD must report EBLI cases to HUD and public health departments within required timeframes.
- Quarterly data sharing with public health departments is encouraged.
- All activities must be documented for HUD monitoring and audit purposes.

Regulatory authority [24 CFR 35.175](#)

Section 6: Anti-Discrimination Policy

St Clair County IGD adheres to the established and adopted Non-Discrimination Policy that is located at [Intergovernmental Grants | Departments | St. Clair \(RC Version: 9.13.3.0\)](#). These protections extend to program applicants, beneficiaries, and participants across all programs, projects, and activities funded in whole or in part with federal assistance administered by the St. Clair County Integrated Grants Department (IGD)/ Community Development Division (CD).

Appendix I

Resources and Guidance

This document contains information and guidance to help recipients understand the purpose and requirements related to [24 CFR Part 35](#) and its components.

Please refer to the following resources for an introduction to the program components and additional resources:

[Lead Safe Housing Rule Resources - HUD Exchange](#)

[Lead-Based Paint Disclosure Rule \(Section 1018 of Title X\) | US EPA](#)

[Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards.pdf](#)

[Protect Your Family from Lead in Your Home \(English\) | US EPA](#)

[Lead Poisoning Home Checklist](#)

[LSHR Toolkit: Lead Definitions Handout](#)

[The HUD Guidelines for the Evaluation and Control of Lead-based Paint in Housing | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)

[Lead Safe Housing Rule Training - HUD Exchange](#)

Revision History

Event	Date
Adopted revisions	2022
Adopted revisions	5/2025