



## National Safe and Healthy Housing Coalition

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# Healthy, Safe, and Resilient Housing

## KEY MESSAGES

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- **Everyone has a right to a healthy and safe home.** This means a home that is dry, clean, safe, ventilated, free of pests and contaminants, well maintained, thermally controlled, affordable, and accessible.
- **Healthy housing is an environmental justice issue** because low income residents and communities of color are more likely to live in the least healthy, least efficient, least resilient homes. Creating healthy, resilient, efficient homes for everyone is an environmental justice imperative.
- **When we do not act to fix inadequate housing, costs pile up** for residents and public and private actors in the form of medical bills, lost income, missed days at school and work, compounding and costlier repair needs, and more.
- **Climate change and extreme weather events have heightened the need for housing to be both healthy and resilient.** Health impacts of climate change include more severe, frequent, and unpredictable extreme weather events, worsened air pollution, and longer and more intense allergy seasons. A healthy home must provide an indoor environment that is free of health hazards and keep residents safe from the forces in the surrounding environment, and now have to account for these changing climate conditions.
- **Communities most at risk from the detrimental health impacts of climate events are also some of the least able to protect themselves or remediate in the wake of an extreme event.** For example, elderly, low income people of color are more likely to suffer most from extreme heat and cold conditions because they often live in unmaintained and thus unhealthy housing.
- **Housing also has a role to play in mitigating climate change** since the residential sector accounts for about 20% of carbon emissions in the U.S.
- **We must think of goals related to resiliency, affordability, and housing quality holistically.** It undermines the investment in resiliency if your home can withstand climate-related disasters, but also poisons your child. Investing in healthy homes is not only a public health imperative, but is critical to unlock the full potential of climate and environmental justice investments. Households in low income and disadvantaged communities will not be able to access IRA residential climate investments without healthy homes programs.
- **Fortunately, housing is a multi-solver.** Investing in healthy, efficient, resilient, affordable homes yields co-benefits that simultaneously advance a range of agendas related to climate, health, racial equity, jobs, economic development, and more. For example, replacing windows in older homes, a frequent source of lead-based paint, with new, efficient windows means that residents will spend less on heating and cooling and also be more protected from lead poisoning.

## ASK #1: FUND HEALTHY HOUSING PROGRAMS

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The NSHHC supports increased federal funding for critical healthy homes programs:

- **At CDC:** programs within the National Center for Environmental Health that address lead and asthma and support environmental public health tracking.
- **At HUD:** grant programs to states, localities, and others administered by the Office of Lead Hazard Control and Healthy Homes.
- **At EPA:** programs within Environmental Programs and Management that address lead, indoor air quality, radon, children's health, and environmental justice; categorical grants to states to address lead and radon.

These programs work to fix hazards in homes, create and enforce evidence-based standards, conduct surveillance and education, equip communities and decision makers with the right data, support state and local programs, provide training and workforce development, and more. For more specific appropriations requests for these programs, please see our attached charts.

## ASK #2: SUPPORT CHANGES TO IMPROVE HUD'S LEAD AND HEALTHY HOMES GRANTS

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HUD's lead grant programs were established by the Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X). Over the subsequent 30+ years, this program has made possible the removal and mitigation of lead-based paint and other environmental hazards in hundreds of thousands of homes. But millions of homes across the country still contain these hazards. In order to continue to expand the capacity of these programs and make it possible for even more families and communities to access these funds, the NSHHC supports the following changes to Title X:

- **Income eligibility criteria.** The current requirements for income documentation are a challenge for most projects and a barrier to participation for some. For residents, there is the challenge of providing all the required documentation along with the privacy issues of providing pay stubs, bank statements, tax returns, and award letters on top of providing information about all the members of their household, children's names and dates of birth. For rental property owners, this can be a difficult thing to ask of their tenants. Tenants often resist providing this information as they see it as only helping their landlord. For the grant, there is the administrative burden, site visits, follow-up as well as the delay to getting the project started.

Also, the same individuals seeking services from HUD programs are often also seeking services from other federal departments. Individuals have to prove income eligibility over and over, which is both a burden on the individual and the programs which are serving them. Any inconsistencies such as area median income being used by one department and poverty level being used by another department creates confusion and could potentially prevent individuals from accessing certain programs designed to support low income families.

To reduce these intrusions on privacy and the burdens and barriers for all the parties, those already enrolled in a federal, state, or local program that is income-limited, should automatically be eligible for participation. In addition, to address high-risk, high-priority communities, allow for the use of geographic criteria for unit eligibility including the Justice 40 census tracts and the Low-Income Housing Tax Credit Qualified Census Tracts. Qualified Census Tracts were used to successfully speed project approvals and reduce participant and administrative burden for ARPA-funded programs which allowed more effort to go more quickly towards improving communities and outreach to communities most in need.

- **Nonprofit grant recipient eligibility.** Nonprofit organizations should be eligible to receive HUD's lead hazard control and lead hazard reduction grants. Many governmental recipients already partner with or subcontract to nonprofits to assist with managing these programs. Nonprofit organizations have already

## ASK #2 continued:

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successfully been receiving and administering other grant programs from this office. This increases the potential pool of applicant communities and allows them to select the lead organization or agency that is best poised for success and impact.

- **Project activity flexibility.** In order to be more responsive to emerging issues and local needs and engage in systems change work, grantees need more flexibility with what they can spend the funds on. For example, some grantees want to be able to more robustly support code enforcement/rental inspections, community and contractor capacity building, and workforce development through this funding. Efforts to make lead-safe property management and repair the standard of practice for everyone in the community should be eligible expenses. Activities such as property lead testing, consultations, and training contractors, consultants, housing agency staff, property owners, and maintenance persons can result in safer practices and lead-safe units, even if those units don't enroll in the grant program. Contractors and consultants trained in residential lead hazard control or testing become a resource for the whole community. The federal government should be focused on the results of programmatic activities, not merely direct unit production. By providing flexibility in the allowable activities under lead and healthy homes programs, the department can create more lasting impact.
- **Project spending thresholds.** Restrictions on the amount that can be spent on a unit, or thresholds that require additional approval from HUD or trigger other rehab requirements in order to move forward, are now outdated due to inflation and rising supply and labor costs. The most hazardous units are often the most costly and complex to address and local housing markets and conditions can change in a matter of months, impacting the number and types of properties that can be recruited. Grantees should be allowed the flexibility to adapt grant unit objectives to correspond to the housing market in their communities as it changes and evolves. The department should not force grantees to not address identified hazards and deficiencies due to arbitrary spending limits. Leaving identified hazards behind which may impact resident health and safety can also impact eligibility for other programs (e.g., weatherization) that require remediation of certain hazards before work can begin.

## ASK #3: SUPPORT THE WHOLE HOMES REPAIR ACT

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- Introduced in the Senate as [S.3871](#).
- This bipartisan bill will establish a pilot program building off the success of Pennsylvania's whole home repair program.
- The five-year pilot program will allow homeowners and property owners to make repairs that make homes more safe, energy efficient, and accessible.
- The pilot program will provide funding to both urban and rural areas.
- This pilot program's holistic approach to home repair could demonstrate a model that:
  - Addresses many of the implementation challenges and constraints of a hazard-specific approach (including challenges noted above).
  - Provides a path forward for scaling up proven and effective solutions for improving housing quality.

*For more information on the National Safe and Healthy Housing Coalition or these asks, contact:*  
**[sarah@nshhcoalition.org](mailto:sarah@nshhcoalition.org)**