
City of Moline

“Special” Citizens Advisory Council on Urban Policy (CACUP)

Monday, February 9, 2015
4:00 p.m.

Council Chambers

City Hall, 619 16th Street, Moline, IL 61265 – 2nd Floor

AGENDA

1. Introductions/Oath of new Appointees
 - Dougal Nelson
 - Janet Zam
 - Carol Triebel
2. Citizen Participation Plan/Process (attachment)
 - CACUP
 - 2015-2019 Consolidated Plan & 2015 Annual Action Plan
 - 2014 CAPER
3. Estimated 2015 CDBG Allocation (attachment)
4. 2016 CDBG Sub Recipient Funding Round
5. Proposed Community Housing Service program changes (attachment)
6. Other
7. Adjournment

Any person with disabilities who wishes to attend the meeting who requires a special accommodation, or any other person requiring a special accommodation in attending the meeting, should notify K.J. Whitley at (309) 524-2044 at least 24 hours prior to meeting time.

Consolidated Plan

The Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the CPD formula block grant programs: **Community Development Block Grant (CDBG) Program, HOME Investment Partnerships (HOME) Program, Emergency Solutions Grant (ESG) Program, and Housing Opportunities for Persons With AIDS (HOPWA) Program.** The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. Grantees report on accomplishments and progress toward Consolidated Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER).

Annual Action Plan

The Annual Action Plan (AAP) is an annual public awareness document that is required by the U.S. Department of Housing and Urban Development (HUD) of any jurisdiction receiving federal entitlement grants, funds allocated to the City of Moline based upon a formula of population and poverty characteristics. The AAP is the annual update to the Consolidated Plan, a 3- or 5-year planning document also required by HUD, which sets forth the county's long-term community development goals and strategies.

CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT (CAPER)

At the conclusion of every Community Development Block Grant Program year, the City of Moline is required to provide the public and HUD an assessment of its accomplishments throughout the Program year. This annual assessment is known as the Consolidated Annual Performance and Evaluation Report (CAPER) and compiled within it an accomplishment summary for the City of Moline's management and allocation of federal resources received from HUD.

This report is due on April 1, 2015. Prior to that date, there will be a fifteen (15) day public comment period, in which the public will have the opportunity to comment on this Report. There will also be a public hearing held at the commencement of the fifteen (15) day period. This period is anticipated to take place mid-February to mid-March, however, dates for this public comment period have not yet been announced. Dates will be announced on the City's webpage, as well as the City of Moline - Planning & Development Department's Facebook page.

(Estimated) Approved CACUP Recommendations for 2015 CDBG Allocation

2015 Projections

Salvation Army	\$	21,610.00
Moline CDC	\$	14,274.00
Administration	\$	134,846.00
Code Compliance	\$	35,500.00
CHS Service Delivery	\$	125,000.00
Sidewalk Program	\$	18,000.00
Community Housing Services Program	\$	225,000.00
CHS - Emergency	\$	50,000.00
CHS - Roofing Program	\$	50,000.00
	\$	674,230.00

***Proposed Community Housing Service Changes**

***Waiting list**

***Lead Requirements**

Recaptures/Subordinations & Program Financing

A. Introduction

The Moline Community Housing Services (CHS) program is designed to aid and assist low or moderate income homeowner-occupants of substandard single-family dwellings with homeowner rehab assistance (eligible items defined later in manual).

Aid and assistance will come from the Community Development Block Grant Funds. This grant is a forgivable loan with a maximum of ~~\$14,999 dollars within a period of 5 years~~ \$4,999 for non roof assembly items and \$10,000 for roof assembly items from the date of final (approved) inspection. A Recapture Agreement will be recorded at the Rock Island County Recorder's Office for a period of 5 years for each occurrence. At the end of the fifth year, the release documents will be prepared by City staff and will be available for pick up at our office. It will be the homeowner's responsibility to record and pay the recording fee that will remove the recapture from the property.

The Owner agrees to repay to the City the Repayment Amount if one or more of the following Recapture Events occurs before the end of the recapture period:

- the Owner sells, conveys or transfers title to the Home for consideration;
- the Owner refinances the Home in a manner such that it is not a Permitted Refinancing (as defined below).

The following events are **not** Recapture Events:

- transfer to a spouse as a result of a divorce;
- a transfer by operation of law to a surviving spouse upon the death of a joint tenant Owner;
- a transfer by will; or
- a Permitted Refinancing.

The term "**Permitted Refinancing**" means a refinancing that lowers the interest rate of the first mortgage loan on the Home, decreases its term or lowers the monthly payment of the loan; it does **not** include a refinancing that increases the outstanding balance of the first mortgage loan, increases the interest rate on the loan or allows the Owner to receive money as a result of the refinancing. Any Permitted Refinancing must be approved by the City, in writing, in advance. **No cash back is allowed.**

If a Recapture Event occurs, the Owner shall pay to the City the amount of the Grant reduced by one sixtieth (1/60th) of that amount for each full month the Owner has occupied the Home during the term of this Agreement.

In the event the Owner wishes to have the City subordinate, the following applies: Subordination of all liens originated as loans or grant through the City of Moline will be considered in cases involving refinancing of homeowner's first mortgage only when the following conditions are met:

- Refinancing will be allowed only if the mortgage product is a fixed rate that fully amortizes over the loan terms. No adjustable or non-standard mortgage products are permitted.
- The refinancing is for a lower interest rate than the existing first mortgage.
- The new loan amount will be less than the current loan amount plus closing costs.
- Cash out is only allowed for home improvement purposes. Documentation to support the amount is required.
- The City will not subordinate to a reverse mortgage.
- Closing costs for the refinance must be within the industry's standard.

The City requires a five (5) business day notification to process and prepare subordinations.

All releases and subordinations are reviewed on a case by case basis; the City has full discretion over decisions for repayment and/or subordinations.

In order to be considered for program assistance, all interested parties shall request to have their name, address of the subject property, and any and all other pertinent information as may be requested by the City placed on the program waiting list. Once an applicant's name and address of primary residence has been placed on the program waiting list, there shall be no trading, exchanging, or bumping of the initial applicant with another person(s) and the same shall be the case with a subject property listed on the program waiting list in terms of no trading, exchanging, or bumping. All recipients shall meet the federal income guidelines limit established each year by Housing and Urban Development (HUD) as defined later in the manual.

Emergency

vi. Eligible Items Under the Emergency Forgivable Loan Criteria

This program provides **one-time ONLY emergency funding assistance** for titled homeowners of record, who are experiencing a problem with their domicile that poses an imminent threat to the health and safety of the residence and meets our pre-determined eligible emergency items. This problem must have occurred without warning and not from creation of negligence of mankind. **Our emergency forgivable loan program is not meant nor does it have the funding to cover every emergency situation that may arise.** This program will only assist with repairing or replacing the listed emergency item; not other items that may obstruct or are attached to the item.

Situations that meet our program's criteria will not result in the titled homeowners of record being placed on a waiting list. Help is available immediately after required documents are submitted and deemed adequate, environmental review is completed and household income is verified; subject to available funding.

Eligible Emergency Items

1. **Accessibility** issues related to handicapped/disability condition(s) of an occupant.
2. **Frozen water lines** or water line breaks as determined by an Illinois Plumbing Inspector or the Moline Water Division.
3. Repairs of inoperative or **dangerous furnace or furnace replacement** during the heating season (October 1st - March 31st) as determined by a registered mechanical contractor. [Written confirmation from a licensed Moline mechanical contractor or utility company is required.](#)
4. Major emergency **roof repairs** will be considered to qualify as an "emergency" situation and potentially eligible when one or both of the following situations are present and have been identified by a qualified City building inspector or their designee:
 - a. Structural damage to the home has occurred as a result of a damaged roof system that has resulted in an immediate life-safety issue as per the city's Building code; and/or

b. A damaged roof system has caused or is contributing to an electrical hazard that presents a life-safety issue as per the City's Building and/or Electrical Code.

5. **Sewer line breaks** as determined by an Illinois Plumbing Inspector or the Moline Sewer Division.

6. **Medical Emergency** – The Program Manager has the discretion to advance a person to the top of the CHS Program waiting list when a person in the household has been diagnosed with a life threatening condition. The improvements to be undertaken must alleviate the negative environmental effects of the life threatening medical condition and must be eligible CHS program activities. The CHS request must be supported through medical records and written verification by the diagnosing medical physician. All documentation must be submitted to the Program Manager in writing and upon request; documents will remain in the possession of the City for the duration of the project.

7. **Electrical – Repair or replacement of non-compliant weather head.** Written confirmation from a licensed Moline electrical contractor or utility company is required.

8. **Water heater – Repair or replacement of an inoperable water heater.** Written confirmation from an Illinois licensed plumber is required.

v. **Eligible Items and Rehabilitations Standards**

(Note: All eligible items must meet City's current adopted federal, state and local codes.)

1. **Drain Tile/Sump Pump**: Installation of drain tile/sump pump.

2. **Electrical**: Size of service and present wiring must meet or be brought up to the Electrical Code.

3. **Foundation/Concrete**: Repair or replacement of basement foundation wall(s) and/or concrete.

4. **Gutters/Downs**: Aluminum, seamless must meet City Code.

5. **H/G Accessibility**: Assist homeowner with disabilities and make their home accessible for daily use. Includes **H/G accessibility** ramps.

6. **Heating**: Repair or replacement must meet the **Heating** Mechanical Code.

7. **Insulation**: Contractor must provide information as to the type of material, square footage in attics and sidewalls, and R-factor rating. A total of R-38 in the attic and R-13 in the sidewalls is the desired range. [Insulation shall meet the current Energy and Building codes.](#)
8. **Plumbing**: Repair or replacement must meet the Plumbing Code.
9. **Roof**: Must meet the requirement of the Building Code.
10. **Water/Sewer Service**: Repair or replacement as ordered by the City Water Department.
- ~~11. **Windows and Siding**: Repair or replacement as ordered by the City Building Division.~~



City of Moline

Citizen Participation Plan/Process

24CFR 91.105

Introduction

The City of Moline is required to adopt a Citizen Participation Plan as set forth by Regulation 24 CFR 91.105 CITIZEN PARTICIPATION PLAN; LOCAL GOVERNMENTS. The City is required to make this plan available to the public. The participation plan must contain the City's policies and procedures for public participation in regards to the Consolidated Annual Action Plan process, use of CDBG funds, as well as other public documents to be submitted to HUD on a yearly basis.

Citizen Advisory Council on Urban Policy

Participation must be an integral part of the planning process for the Consolidated Submission for Community Planning and Development Programs (Consolidated Annual Action Plan). Thus, the City of Moline has a Citizen Advisory Council on Urban Policy (CACUP) to act as ambassador for citizens.

In 1975 the City of Moline established CACUP pursuant to the regulations established by Congress in passing the Housing Community Development Act of 1974. From this Act the Community Development Block Grant (CDBG) program was formed. In association with Section 105 of the ACT and the regulations therein, the Office of Assistant Secretary of Community Planning and Development created Title 24 of the Code of Federal regulations. The code provides guidance and direction on the implementation of CDBG programs and a process for developing the citizen participation plan/process. CACUP's main objectives are as follows:

1. Conduct public hearings to insure citizen participation in planning, implementation and assessment of CDBG programs.
2. Formulate recommendations to city council for the annual allocation of Federal Community Development Block Grant funds for public service, administration, property and infrastructure improvements, and economic revitalization activities targeted to low and moderate income individuals.
3. To identify Community Development needs, particularly those of low/moderate income persons.
4. To promote public information efforts to educate citizens regarding the availability of CDBG funded programs.
5. To review and approve the 5-year Consolidated Plan
6. To support efforts of the City Council and other City Commissions in assessment of general development needs of the community.

The aforementioned objectives are in harmony with 24CFR 91.100-91.115 of the Code of Federal Regulations.

However, the responsible legislative body in matters relating to the Consolidated Plan and annual Action Plan process is City Council. As directed by City Council, CACUP shall be involved in the development of the consolidated plan and annual action plan. Nevertheless, CACUP is directed to make specific funding and program

recommendations on the use of community development block grant funds to the city council.

The citizens' advisory council meetings are held on the second floor in the Committee of the Whole Room at City Hall, 619 16th Street, and are open to the public. The Committee is not intended to exclude any individual citizen input. All citizens of Moline are encouraged to participate in every public meeting and to contact the community development division with any questions concerning the process and the programs pertaining to the consolidated or annual action plan.

The Consolidated Plan is a single submission process for the Community Development Block Grant (CDBG), program. A part of the Consolidated Plan is the Action Plan, which establishes the annual budget for this program. The Department of Housing and Urban Development (HUD), in its attempt to assure adequate opportunity for participation by program beneficiaries, has prescribed minimum submission, performance, and record maintenance requirements. These requirements are spelled out under 24 Code of Federal Regulations (CFR), 570.507 (Performance Report), 570.704(a) (Loans Guarantee Pre-submission and Citizen Participation Requirements) and 570.506 (Records to be Maintained by Recipient) 24CFR Part 91.105 (Citizen Participation Plan; Local Governments) and 24 CFR Part 91.505(Amendments to the Consolidated Plan).

The CDBG Program is administered by the Planning Department, Community Development Division of the City of Moline. The local citizen participation process generally includes a yearly series of public meetings held at city hall, which is centrally located in a lower income census tract; this in effort to obtain additional participation of low to moderate income families in the Consolidated Plan and Performance Report review process. All meetings/hearings are advertised in accordance with applicable HUD, State and local regulations. Public notices for environmental procedures and project related purposed are also part of the citizen participation process.

Encouragement of Citizen Participation

The City of Moline encourages participation by low- and moderate- income persons in the development of the Consolidated Annual Action Plan, substantial amendments and performance reports. These persons would most likely live in the areas in which the CDBG funds are proposed to be used. The City of Moline will take whatever action necessary to include minorities, non-English speaking persons, and persons with disability to participate.

Planning Process

The Consolidated Plan is a U.S. Department of Housing and Urban Development (HUD) requirement that combines the planning and application process for four existing HUD grants: The Community Development Block Grant (CDBG), the Emergency Shelter

Grant (ESG), HOME Investment Partnerships Program (HOME), and Housing Opportunities for Persons with AIDS (HOPWA).

In effect, the Consolidated Plan examines the current housing situation, explores the housing and community development needs of the City, and sets priorities for spending HUD grant funds. Public comment is a vital component of exploring the City's housing and community development needs and setting spending priorities. The Consolidated Plan offers the opportunity for strategic Citywide planning to occur alongside citizen participation.

HUD requires development of a Citizen Participation Plan that outlines policies and procedures of how the City intends to solicit citizen participation. The purpose of the Citizen Participation Plan is to outline and define the citizen participation process.

Development of the Consolidated Annual Action Plan

The City of Moline must make the Consolidated Annual Action Plan available to citizens, public agencies and other interested parties prior to adopting the plan. The City proposes to do so by the following:

Public Comment on the Proposed Consolidated Plan:

Before the Consolidated Plan is drafted, it will be advertised and a public meeting will be held to gather input from citizens regarding proposed changes. Generally, this meeting will be held in Moline City Hall Committee of the Whole Room. If for some reason the advertised sites are not available, the meeting will be held at the Moline Township Hall the public will be encouraged to send their comments in writing. Written comments are encouraged at any time.

Notices of the meeting will be published in the Dispatch/Argus newspaper no less than 15 days prior to the meeting and a press release will be forwarded to all local newspapers.

Once drafted and before the Consolidated Plan is adopted, it will be made available to interested parties for a comment period no less than 30 days. This comment period will begin between 90 and 120 days before the Consolidated Plan's submission date to HUD, which is approximately November 15th of each year.

A public meeting will be conducted during the 30-day comment period to gather comments on the proposed plan.

Citizens will be notified of the Consolidated Plan's availability through newspaper notification. A display ad will be published in the daily newspapers at the beginning of the comment period along with a press release that will be forwarded to all newspapers in English and Spanish in the Metro Area.

Along with the notification that the proposed Consolidated Plan is available for public comment, a summary of the Consolidated Plan's contents and the Consolidated Plan's purpose will be published. The notification will be published on the day the Consolidated Plan comment period begins. Locations where copies of the entire proposed consolidated plan may be obtained will also be stated in the notice.

The proposed Consolidated Plan will be available at The City of Moline's website at www.moline.il.us for the full public comment period. Copies of the Consolidated Plan will also be available from City of Moline Community Development Division during the public comment period. Citizens or groups that have attended the public hearings will receive a letter notifying them of the Consolidated Plan's availability for comment if their address is provided to the Planning Department at the time of the hearing.

Amendment Criteria

The following criteria will constitute a substantial amendment to the Consolidated Annual Action Plan.

1. A change in the use of CDBG money from one activity to another, in excess of \$100,000.00.
2. The elimination of an activity originally described in the Annual Action Plan.
3. The addition of an activity not originally described in the Annual Action Plan.
4. A change in the purpose of an activity, such as a change in the type of activity or its ultimate objective; for example, a change in a construction project from housing to commercial.
5. A meaningful change in the location of an activity.
6. A change in the type or characteristics of people benefiting from an activity. Among the "characteristics" are:
 - a. The HUD-recognized income levels of: 0-30% of area median income; between 31%-50% of AMI; and between 51% and 80% of AMI.
 - b. Race or ethnicity.
 - c. Renter or homeowner
 - d. Single households, small ones (2-4 people), large ones (5+ persons).
7. A 50% decrease in the number of low or moderate income people benefiting from an activity.

8. A change in the scope of an activity, such that there is a 50% increase or decrease in the amount of money allocated to the activity.

In the event of an amendment to the Consolidated Plan, the proposed amended Consolidated Plan will be made available to interested parties for a comment period of no less than 30 days.

Citizens will be notified of the amended Consolidated Plan's availability through newspaper notification. The notification will appear in at least two newspapers that are circulated through the Metro Area. The notification will be published the day the amended Consolidated Plan comment period begins.

The amended sections will be available for viewing on The City of Moline's website www.moline.il.us or copies may be obtained from the City of Moline Planning and Development Department during the public comment period.

Consideration of the Public Comment on the Amended Plan

Comments on the amended Consolidated Plan by individuals or groups received in writing or at public meetings will be considered. A summary of the written and oral public comments on the amendments, and a summary of those not accepted and the reasons therefore, will be included in the addendum to the final Consolidated Plan.

Consolidated Annual Performance Evaluation Report

Before the Consolidated Annual Performance Evaluation Report (CAPER) is submitted to HUD, it will be made available to interested parties for a comment period of no less than 15 days. This comment period will begin between 20 and 45 days before the APR's submission date to HUD, which is March 30th.

Citizens will be notified of the CAPER's availability through newspaper notification. The notification will appear in at least two newspapers that are circulated throughout the Metro Area and on The City of Moline's website. The notification will be published the day the CAPER comment period begins.

The CAPER will be available at The City of Moline's website for the full public comment period. Copies of the APR will be available from the City of Moline's Planning Department by mail during the public comment period.

Comments will be considered from individuals or groups received in writing. A summary of the written comments and a summary of those not accepted and the reasons therefore, will be included in the final CAPER.

The CAPER will contain the following information and

- Executive Summary

- Narratives
 - Assessment of Three- to Five- Year Goals and Objectives
 - Affirmatively Furthering Fair Housing
 - Affordable Housing
 - Continuum of Care
 - Other Actions
 - Leveraging Resources
 - Self-Evaluation
- Citizen Participation
- Community Development Block Grant
 - Narrative
 - IDIS Reports
 - PR03
 - PR10
 - PR26
 - PR06
 - PR23
- Home Investment Partnerships
- Emergency Shelter Grants

Public Hearings

Two public hearings per year will be held to obtain citizen's views and responses to proposals and questions. These meetings will be at two different stages of the program year. These meetings will address housing and community development needs, development of proposed activities and review of program performance. At least one of the meetings will be held prior to the Consolidated Annual Action Plan being published for comment. Citizens will be notified of the hearing by newspaper publishing.

Public Comment on the Proposed Consolidated Plan

Before the Consolidated Plan is drafted, it will be advertised and a public meeting will be held to gather input from citizens regarding proposed changes. Generally, this meeting will be held in Moline City Hall Committee of the Whole Room. If for some reason the advertised sites are not available, the meeting will be held at the Moline Township Hall the public will be encouraged to send their comments in writing. Written comments are encouraged at any time.

Notices of the meeting will be published in the Dispatch/Argus newspaper no less than 15 days prior to the meeting and a press release will be forwarded to all local newspapers.

Once drafted and before the Consolidated Plan is adopted, it will be made available to interested parties for a comment period no less than 30 days. This comment period will begin between 90 and 120 days before the Consolidated Plan's submission date to HUD, which is approximately November 15th of each year.

A public meeting will be conducted during the 30-day comment period to gather comments on the proposed plan.

Citizens will be notified of the Consolidated Plan's availability through newspaper notification. A display ad will be published in the daily newspapers at the beginning of the comment period along with a press release that will be forwarded to all newspapers in English and Spanish in the Metro Area.

Along with the notification that the proposed Consolidated Plan is available for public comment, a summary of the Consolidated Plan's contents and the Consolidated Plan's purpose will be published. The notification will be published on the day the Consolidated Plan comment period begins. Locations where copies of the entire proposed consolidated plan may be obtained will also be stated in the notice.

The proposed Consolidated Plan will be available at The City of Moline's website at www.moline.il.us for the full public comment period. Copies of the Consolidated Plan will also be available from City of Moline Community Development Division during the public comment period. Citizens or groups that have attended the public hearings will receive a letter notifying them of the Consolidated Plan's availability for comment if their address is provided to the Planning Department at the time of the hearing.

Availability to the Public

The approved Consolidated Plan, APR, and any substantial amendments will be available to the public within 30 days of HUD's approval of the document. Copies of the Consolidated Plan and APR will be available through the City of Moline's website. Copies may be requested from the City of Moline Planning Department.

Upon request, the Consolidated Plan and APR will be made available in a form accessible to persons with disabilities.

Access to Records

Interested parties will be provided access to information and records relating to the Consolidated Plan and any other uses of assistance under the programs covered by this part during the preceding five years. The public will be provided reasonable access to housing assistance records, subject to City and local laws regarding privacy and obligations of confidentiality, during the APR public comment period.

Technical Assistance

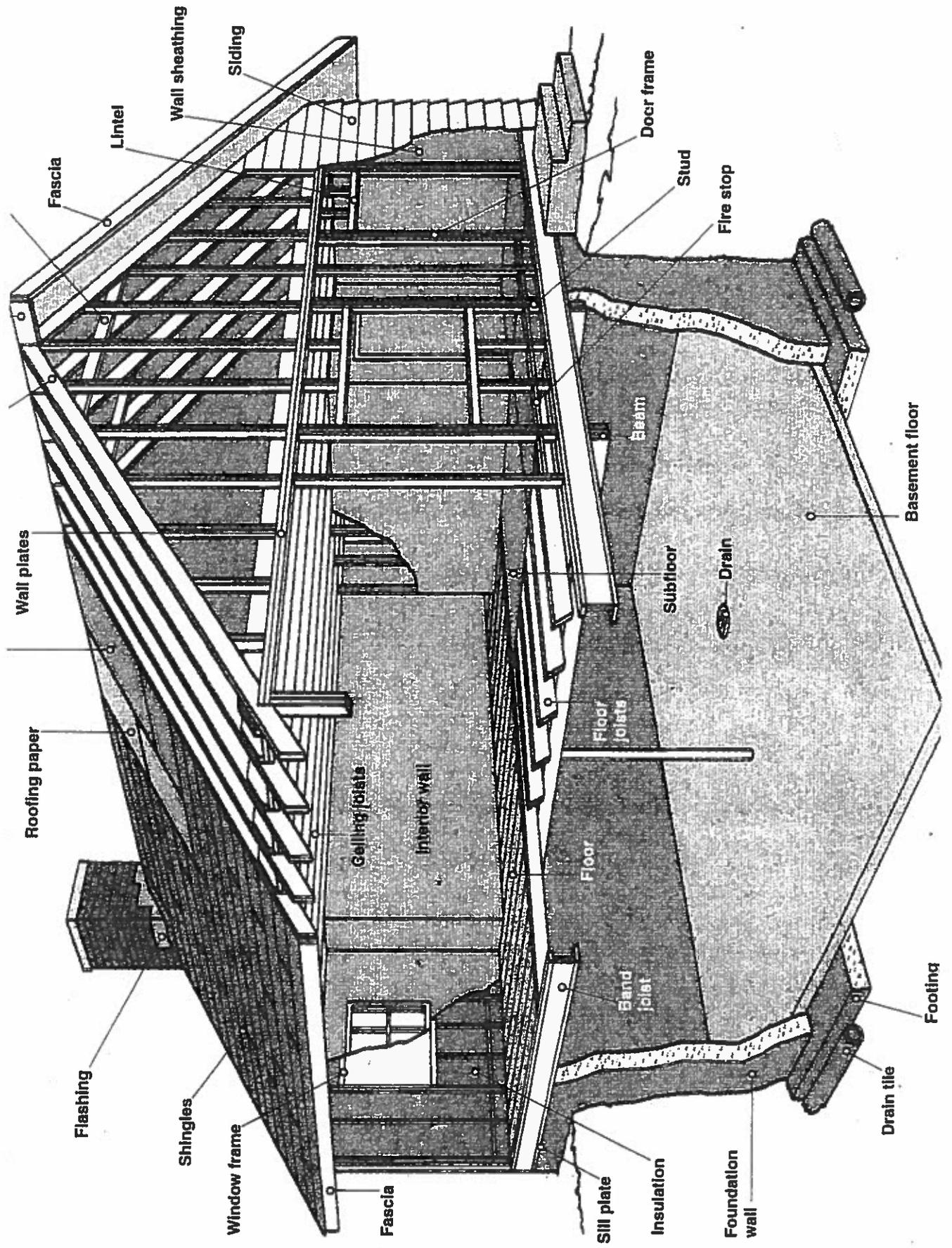
City staff will work with organizations and individuals representative of low and moderate income people who are interested in submitting a proposal to obtain funding for an activity. All potential applicants for funding are encouraged to contact City staff in the Community Development Division for technical assistance before completing a proposal form.

Complaints

Substantive written response to every written citizen complaint will be provided within 15 working days of receiving the comment.

*City of Moline
Planning & Development Department
Community Development Division
619 16th Street
Moline, IL 61265*

or by accessing The City of Moline's website at www.moline.il.us



APPENDIX 6

SUMMARY OF LEAD SAFE HOUSING RULE REQUIREMENTS			
Subpart of Rule/ Type Program	Year Built	Owner/Landlord Requirements ^{1, 2, 3}	Participant Monitoring Requirements
I HUD-Owned Multi-family Property	Pre-1978	<ul style="list-style-type: none"> ✦ Provision of pamphlet. ✦ LBP inspection and risk assessment. ✦ Interim controls. ✦ Passing clearance exam. ✦ Notice to occupants. ✦ Ongoing LBP maintenance and reevaluation if HUD owns property for over 12 months. ✦ Response to EIBLL child.⁵ 	
J Rehabilitation Assistance:			
For all Properties	Pre-1978	<ul style="list-style-type: none"> ✦ Provision of pamphlet. ✦ Paint testing of surfaces to be disturbed, or presume LBP. ✦ Notice to occupants. ✦ Ongoing LBP maintenance if HOME. 	Have system in place that documents they or the subrecipients ensure Owner/Landlord complies with Lead Safe Housing Rule and Lead Disclosure Rule
1. Property receiving less than or equal to \$5,000 per unit	Pre-1978	<ul style="list-style-type: none"> ✦ Safe work practices in rehab. ✦ Repair disturbed paint. ✦ Passing clearance exam of the worksite. 	
2. Property receiving more than \$5,000 and up to \$25,000	Pre-1978	<ul style="list-style-type: none"> ✦ Risk assessment. ✦ Interim controls. ✦ Passing clearance exam. 	
3. Property receiving more than \$25,000 per unit	Pre-1978	<ul style="list-style-type: none"> ✦ Risk assessment. ✦ Abatement of LBP hazards. ✦ Passing clearance exam. 	
K Acquisition, Leasing, Support Services, or Operation	Pre-1978	<ul style="list-style-type: none"> ✦ Provision of pamphlet. ✦ Visual assessment. ✦ Paint stabilization. ✦ Passing clearance exam. ✦ Notice to occupants. ✦ Ongoing LBP maintenance. 	Have system in place that documents they ensure Owner/Landlord complies with Lead Safe Housing Rule and Lead Disclosure Rule